

**From:** Matthew Nameth <nameth.matt@gmail.com>  
**Sent:** Saturday, July 08, 2017 2:23 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Stop Reckless Land Management  
**Attachments:** images.jpg

Dear Public Servant,

This letter is in regards to Line 3, docket number CN-14-916, and docket number PPL-15-137. There are many people across the country keeping a eye on your actions. You have the potential to preserve your beautiful State of Minesota for many future generations. Line 3 is posing a major threat to national security. Being the headwaters of the Mississippi River, and a state of the Great Lakes region, the State of MN and it's elected officials have a comitment to protect our nation, and it's waters. I strongly oppose this project and feel the Line 3 project, if approved, will turn into a situation larger than that of Standing Rock. This letter is in no way a threat. The people will come in a good way. Peacefully. Yet they will be assaulted by unregistered private security firms, militarized police forces, and National Guard for taking action against issues that should not be overlooked by the state of MN. Please ask yourself if you want that in your state.

## **10 THINGS EVERY AMERICAN NEED TO KNOWABOUT THE LINE 3 DEIS**

Enbridge wants to abandon their crumbling Line 3 pipeline in our lands and build a new one in a new corridor through our lakes, wild rice beds, and treaty territories. The [Draft Environmental Impact Statement \(DEIS\)](#) for the Line 3 pipeline found that every single option for the project would have long-term detrimental effects on tribal communities. Most of the issues specific to tribal people and resources are confined to a separate chapter that attempts to provide “an American Indian perspective”, siloed and excluded from the main chapters that assess potential impacts. The 5000+ page document attempts to justify why the oil industry’s need to profit is greater than the need of the Anishinaabeg people to survive.

These are the 10 ways the Line 3 DEIS has failed to serve tribal communities of Minnesota:

### **1. NO FREE, PRIOR, AND INFORMED CONSENT OF TRIBAL NATIONS**

Enbridge seems to have learned nothing from Standing Rock. Nowhere does the document say that free prior and informed consent of Tribal Nations must be attained through formal Nation-to-Nation consultation before any plans or decisions are made for this pipeline.

The State of Minnesota doesn't seem to understand the basic concept of tribal sovereignty. The route alternatives compared in the DEIS include two routes, called RA-07 and RA-08, that would cross the Leech Lake and Fond du Lac Reservations, despite the fact that the tribes clearly will not consent to a new pipeline. Enbridge's "preferred" route would skirt reservations boundaries while still crossing watersheds and lands of 1855 Treaty Territory. This is a clear attempt to circumvent tribal consent.

## **2. DISREGARD FOR THE HEALTH OF TRIBAL COMMUNITIES**

Chapter 9 of the DEIS acknowledges that impacts on tribal communities "are part of a larger pattern of structural racism" that tribal people face in Minnesota. The DEIS also states that "the impacts associated with the proposed Project and its alternatives would be an additional health stressor on tribal communities that already face overwhelming health disparities and inequities", but concludes that is "insufficient reason" to deny the project.

## **3. NO CONSULTATION OR PLAN FOR PROTECTING SACRED SITES**

Just as we saw in North Dakota, the assessment of archeological artifacts were performed by the company, whose best interest is to put the pipeline through their preferred route at any cost. Enbridge admits that 63 sacred sites are slated for destruction, but claims that only 3 are eligible for protection under the National Register of Historic Places (5.4.2.6.1). Pipeline corporations cannot be trusted to understand and implement protections for our numerous sacred sites.

## **4. NO PROTECTIONS FOR WILD RICE LAKES**

The DEIS acknowledges that "traditional resources are essential to the maintenance and realization of tribal lifeways, and their destruction or damage can have profound cultural consequences." It also shows that Enbridge's preferred route would "impact more 1855 Treaty Territory wild rice

lakes and areas rich in biodiversity than any of the proposed alternative routes.” These sensitive areas would be the worst place for a tar sands oil spill.

## **5. LINE 3 IS GUARANTEED TO SPILL**

The DEIS estimates the annual probability of different kinds of spills on the proposed route:

**Pinhole leak = 27% (once every 3.7 years)**

**Small Spill = 107% (once every 11 months), Medium = 7.6%, Large = 6.1%**

**Catastrophic = 1.1% (once every 87 years)**

Basically what this means is that in 50 years, the 1855 treaty territory can expect 14 pinhole leaks, 54 small spills, 4 medium, 3 large, and 1 catastrophic spill.

The DEIS also contains no spill analysis for tributaries of the St. Louis River (which is already a [toxic superfund site](#)) or Nemadji River, where a spill could decimate our sacred Gichigami, Lake Superior.

## **6. NO “WELLS TO WHEELS” ASSESSMENT OF IMPACT**

There is zero discussion of how Line 3 starts at the sacrifice zone of the Alberta Tar Sands where Dene and Cree people continue to be poisoned, raped, and murdered by the most extreme extraction project in the world. Further, there is no mention of how with 370,000 bpd of additional capacity, Enbridge will need a new pipeline departing its terminal in Superior. We know that they plan to expand pipelines through Ojibwe and Ho-Chunk territories in Wisconsin to accommodate. Finally at the end of the line, refineries are poisoning communities of color. Residents live with fear of kidney failure, autoimmune diseases and cancer and early death due to [chemical exposure from massive refineries](#). This big picture must be considered to truly assess the impacts the Line 3 pipeline.

## **7. NO PLAN TO HOLD ENBRIDGE ACCOUNTABLE**

Neither the State of Minnesota nor the Federal Government have a plan for enforcing environmental regulations for Line 3. When searching through extensive databases of Enbridge's spill history, the numbers often disappear once they hit the reservation line. How many spills have already ruptured in our communities without any response or reporting?

Many of the DEIS's environmental impacts and plans for minimizing them are drawn directly from Enbridge's permit application without any evidence of compliance or genuine consideration that Enbridge won't follow all the rules. History shows that they continually violate permit conditions.

## **8. NO PLAN TO STOP SEX TRAFFICKING IN PIPELINE MAN-CAMPS**

The DOC assumes "all workers would re-locate to the area" and zero construction jobs will go to Minnesotans. We are all too familiar with how "the addition of a temporary, cash-rich workforce increases the likelihood that sex trafficking or sexual abuse will occur". But the DEIS dismisses this problem quickly, saying that "Enbridge can prepare and implement an education plan or awareness campaign around this issue" (11.4.1). That is in no way an assurance that our women and children will be any safer come 2018 when construction is slated to begin.

## **9. INADEQUATE ASSESSMENT OF ABANDONMENT**

Enbridge's current plan is to cap off the crumbling old Line 3 pipe in sections and leave it in the ground for landowners to take care of, setting a dangerous precedent for future pipelines in Minnesota, including the NEW Line 3. The risks of abandoning pipelines are not adequately assessed in the DEIS. There is no discussion of the dangers of exposed pipe, how fast it will corrode, or how much currently buried pipe will become exposed once it is emptied. These rusting pipes are conduits, and could one day drain a lake or wetland and dump toxified water onto farm fields. What is the plan for cleaning up the contamination from the countless spills that have already occurred along Line 3? There is also no mention of the abandonment of the other 3 ancient pipelines in Enbridge's existing mainline corridor (Lines 1, 2, and 4), which we expect Enbridge will very soon attempt to follow suit. It should also be known that Enbridge will stop paying taxes to the MN counties along the mainline corridor. For many of these poor northern counties including

the Leech Lake and Fond du Lac reservations, revenue from Enbridge's property tax makes up a significant portion of the county budget.

## **10. THE “NO BUILD” OPTION IS NOT GENUINELY CONSIDERED**

The DEIS includes an option of the “Continued Use of Existing Line 3” (Chapters 3 and 4), but nowhere is the “No Build” Alternative considered. Enbridge already has a massive pipeline corridor leaking across our territories. It is not the responsibility of our communities to continue to sacrifice our waters and lands so a foreign corporation can maintain their bottom line. When will the “Shut Line 3 Down Because It's Falling Apart and Poisoning Our Communities” option be considered?



Please provide your contact information. This information and your comments will be publicly available.

Name:

Ed Nardone

Street Address:

501 River Road #303

City:

Grand Rapids

State:

MN

Zip Code:

55744

Phone or Email:

ednardone@hotmail.com

Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

I'm concerned about wildlife, fish and livestock. I'm also worried like everyone oil will get into public water. Toxic chemicals might get into our food and water system. I'm worried they want to build more pipelines that run under more lakes and rivers. I live on the Mississippi. My parents live on a lake. I'm an environmentalist and animal rights activist. I'm getting concerned about climate change.

**Levi, Andrew (COMM)**

---

**From:** Narigonia . <narigonia@gmail.com>  
**Sent:** Sunday, July 09, 2017 2:55 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Enbridge Energy's Line 3

To Whom it May Concern,

I am writing to express my concern with the proposed construction of Enbridge Energy's Line 3 tar sands oil pipeline and the DEIS (CN-14-916 and PPL-15-137).

While there are a number of factors of the proposal that alarm me, my top concern is over the social cost of the carbon that would result from this project.

The DEIS estimates that the building of this pipeline could result in a cost as high as \$287 billion over 30 years. Not only is this crazy high, but it's an estimate that only takes into consideration the shortest possible lifespan of the pipeline.

The DEIS must be updated to include an estimate of the climate cost that a pipeline in operation for 60 years or longer will have. Only then will the DEIS fully capture the impact that this pipeline will have on our state.

Thank you for your time.

Amelia Narigon  
Minneapolis, MN



# I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                  |                     |       |
|------------------|---------------------|-------|
| FULL NAME        | PHONE NUMBER        | EMAIL |
| Pat Nassing      |                     |       |
| ADDRESS          | 1621 US Hwy 169     |       |
| CITY, STATE, ZIP | Winnebago, MN 56098 |       |

COMMENTS

I support the Line 3  
replacement project

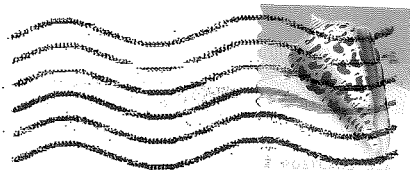
DECLARE THE EIS ADEQUATE WITHIN 280 DAYS

# Line 3 Replacement Project DEIS

- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- **Years of environmental study:** Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- **Infrastructure replacement:** As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137

FMS L



Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198



**Levi, Andrew (COMM)**

---

**From:** SHARON NATZEL <sorgww@aol.com>  
**Sent:** Monday, July 10, 2017 10:50 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Public Comment: Line 3 Project (CN-14-916 and PPL-15-137)  
**Attachments:** Public Comments Line 3 Project by Sharon Natzel.pdf; Public Comments Line 3 Project by Sharon Natzel.pdf

Dear Jamie MacAlister, Environmental Review Manager,

Attached are my comments for the first Draft Environmental Impact Statement in the State of MN for a Pipeline!

Thank you for the opportunity to comment on this.

Sincerely,  
Sharon Natzel

Sharon Natzel  
13623 County 20  
Park Rapids, MN 56470

July 10, 2017

Jamie MacAlister  
Environmental Review Manager  
MN Department of Commerce  
85 7<sup>th</sup> Place East, Suite 280  
St. Paul, MN 55101-2198

Subject: Docket Nos. CN-14-916 and PPL-15-137; Public Comment: Line 3 Project (C-14-916 and PPL-15-137)

Dear Jamie MacAlister, Environmental Review Manager,

In the Public Comment Period announcement, the public was encouraged to identify what could be improved in the EIS? What is unclear? What is missing? Here are my findings from review of the Draft Environmental Impact Statement. My comments pertain primarily to Chapters 5, 6, 7, 9, 11 for economic and environmental concerns plus Chapter 12 for cumulative effects.

What is missing and therefore could be improved upon is the following for all for economic, environmental and cumulative effects....

1. The Minnesota Pipe Line Company, LLC website states that there are 4 lines currently which run from Clearbrook to the Twin Cities and can transport 465,000 barrels of crude oil today. Their website further states it is the primary pipeline system supplying the Twin Cities Refineries. In Chapter 12, pg 7-8, the upgrade of the pump stations in MPL Reliability Project will increase throughput 185,000 barrels per day and be completed before Line 3 Replacement (L3R) would be anticipated to begin. This additional capacity that will be available for MN isn't taken into account in the Certificate of Need. If the Twin Cities refineries are gaining additional oil for their existing capacity, is the L3R additional capacity actually needed for MN or is the current constrained throughput of L3R adequate? The US Dept of Energy data shows that there are 2 refineries servicing MN. So the upgrade projection of oil to Superior through L3R is not needed for these 2 MN refineries based on the oil supply pipe lines depicted on Minnesota Pipe Line Company, LLC website; the supply pipe lines are from Clearbrook.
2. Given that there are 4 MPL pipes in the pipeline right-of-way already from Clearbrook to Park Rapids, and the L3R project seeks to establish a new corridor from Clearbrook to Superior, WI by placing L3R pipeline into the corridor from Clearbrook to Park Rapids (Chapter 8, item 9 for an additional pipeline addition after L3R), it is apparent that the argument used for the new proposed L3R because if replaced in place Line 3 is in the middle of the established Enbridge Mainline System, hasn't been thought thoroughly out and represented adequately in the DEIS. What is occurring is that the 4 MPL pipes will begin to be boxed in at least on one side by L3R and maybe others added to the "new" corridor making it more difficult to work on the MPL pipes and soon MPL will be in the same predicament as Enbridge mainline system. One of the MPL pipelines is from 1950's era currently according to their website. The L3R project proposed route is creating a new problem for the existing MPL established mainline system because they will be faced with the same dilemma as Enbridge when they go to replace the aged pipeline if the proposed L3R project is approved. The MPL will have at least one additional pipe to reach over in order to repair or replace pipes in their existing right-of-way. Will the MPL Company be then forced to "abandon" in place one of their old aged pipelines from the 1950's because of the proposed L3R making it risky to repair / replace in place their own? The cumulative impacts also are not adequately covered for these scenarios.
3. RA-07 is not given adequate cost benefit analysis for the environment. RA-07 replaces Line 3 in place by removing the pipe and adding new. This is a great environmental benefit long term to the State of MN. The text

in the various chapters depicts the “costs” to environment of doing RA07 being as great as proposed route. It appears that the “picture” being painted is for the proposed L3R route. Since the pipes in the mainline corridor are aging, the additional space and damage to forests and potential purchase of homes in the immediate work zone could be utilized as a benefit to keep the mainline system routes intact in MN for the future without moving to a new proposed corridor now and into the future. This protects the MPL environment with its last pipeline built in 2008 xwhich supplies the two MN refineries and reduces the risk to MN in general. The existing mainline system corridor pipelines could be groomed for easy replacement over time through the Line 3 Replacement project, executed “in place”. The growth of contaminated sites would be minimized too with containment hopefully in the existing corridor since there are likely spots that will be discovered during the replacement project.

4. Adding RSA-53 to RA-07 makes it very attractive as the second best option to SA04. RSA-53 also lacked substantial analysis. By utilizing RSA 53, along with RA-07 there are a number of factors that are minimized in both the environmental and economics realm. This is important and needs to be looked at from a long-term mainline system replacement plan perspective.
5. SA-04 is not analyzed well from an economic and environmental perspective. The oil company right-of-ways followed by the proposed alternative route are not depicted nor used in the analysis. The widths for right-of-ways are not “apples to apples” comparisons for L3R. The contaminated area numbers should not be a factor for a pipeline being laid in a pipeline right-of-way portion as is the case for SA-04. The oil product flowing in the pipe is not affected by the contaminated soil. It is likely that the number of contaminated sights is high because SA-04 crosses multiple states and is on oil company’s ROW which would have higher numbers of contamination over time due to spills / leaks. The Alliance Pipeline is followed by SA-04 for a large portion of the proposed route. On the Alliance Pipeline website, it says it is owned by Alliance Pipeline L.P. (Alliance USA) who owns the US portion of the Alliance Pipeline System. Sponsors of Alliance USA are affiliates of Enbridge Income Fund Holdings, Inc (50%) and Venesen Inc (50%). The right-of-way data for SA-04 could be analyzed using information from Alliance USA. <https://www.alliancepipeline.com/about-us/documents/maps/marketdeliverymap.pdf>
6. Water Quality is not addressed adequately in a qualitative or quantitative manner.
  - a. There is data available that is being ignored that could enable improved education / decision-making. There are many citizen water quality monitors who sample the lakes and streams not only in Hubbard County but also across the state of MN. The clarity measure is done with the secchi disk provided by the MPCA. The water samples gathered by the citizen monitors using the 2-meter integrated sampler plus phosphorous and chlorophyll-a water samples are taken monthly and are analyzed by RMB Environmental Laboratories each month, May through Sept. Hubbard County lakes just celebrated 20 years of water, including Twin Lakes which you have a spill scenario for. The 20 year report will be available at the end of August 2017. The 15-year report for 39 Hubbard County lakes is found at this link: [http://www.hubbardcolumn.org/uploads/3/4/5/6/34563649/hubbard\\_county\\_summary.pdf](http://www.hubbardcolumn.org/uploads/3/4/5/6/34563649/hubbard_county_summary.pdf).
  - b. Several lakes in Hubbard County monitor for Dissolved Oxygen and Temperature of the water column at one meter increments to the bottom of the lakes to determine how the fish are doing. Suspended Solids are tracked along with Nitrates and Chloride on some lakes.
  - c. There is also a Biotic Index of Invertebrate used to determine the health of the body of water based on the animals it contains that are useful. <http://www.pspb.org/water/media/BioticIndexCard.pdf>

Thank you for the opportunity to comment on Minnesota’s first Draft Environmental Impact Statement for a Pipeline.

Sincerely,

Sharon Natzel

Sharon Natzel  
13623 County 20  
Park Rapids, MN 56470

July 10, 2017

Jamie MacAlister  
Environmental Review Manager  
MN Department of Commerce  
85 7<sup>th</sup> Place East, Suite 280  
St. Paul, MN 55101-2198

Subject: Docket Nos. CN-14-916 and PPL-15-137; Public Comment: Line 3 Project (C-14-916 and PPL-15-137)

Dear Jamie MacAlister, Environmental Review Manager,

In the Public Comment Period announcement, the public was encouraged to identify what could be improved in the EIS? What is unclear? What is missing? Here are my findings from review of the Draft Environmental Impact Statement. My comments pertain primarily to Chapters 5, 6, 7, 9, 11 for economic and environmental concerns plus Chapter 12 for cumulative effects.

What is missing and therefore could be improved upon is the following for all for economic, environmental and cumulative effects....

1. The Minnesota Pipe Line Company, LLC website states that there are 4 lines currently which run from Clearbrook to the Twin Cities and can transport 465,000 barrels of crude oil today. Their website further states it is the primary pipeline system supplying the Twin Cities Refineries. In Chapter 12, pg 7-8, the upgrade of the pump stations in MPL Reliability Project will increase throughput 185,000 barrels per day and be completed before Line 3 Replacement (L3R) would be anticipated to begin. This additional capacity that will be available for MN isn't taken into account in the Certificate of Need. If the Twin Cities refineries are gaining additional oil for their existing capacity, is the L3R additional capacity actually needed for MN or is the current constrained throughput of L3R adequate? The US Dept of Energy data shows that there are 2 refineries servicing MN. So the upgrade projection of oil to Superior through L3R is not needed for these 2 MN refineries based on the oil supply pipe lines depicted on Minnesota Pipe Line Company, LLC website; the supply pipe lines are from Clearbrook.
2. Given that there are 4 MPL pipes in the pipeline right-of-way already from Clearbrook to Park Rapids, and the L3R project seeks to establish a new corridor from Clearbrook to Superior, WI by placing L3R pipeline into the corridor from Clearbrook to Park Rapids (Chapter 8, item 9 for an additional pipeline addition after L3R), it is apparent that the argument used for the new proposed L3R because if replaced in place Line 3 is in the middle of the established Enbridge Mainline System, hasn't been thought thoroughly out and represented adequately in the DEIS. What is occurring is that the 4 MPL pipes will begin to be boxed in at least on one side by L3R and maybe others added to the "new" corridor making it more difficult to work on the MPL pipes and soon MPL will be in the same predicament as Enbridge mainline system. One of the MPL pipelines is from 1950's era currently according to their website. The L3R project proposed route is creating a new problem for the existing MPL established mainline system because they will be faced with the same dilemma as Enbridge when they go to replace the aged pipeline if the proposed L3R project is approved. The MPL will have at least one additional pipe to reach over in order to repair or replace pipes in their existing right-of-way. Will the MPL Company be then forced to "abandon" in place one of their old aged pipelines from the 1950's because of the proposed L3R making it risky to repair / replace in place their own? The cumulative impacts also are not adequately covered for these scenarios.
3. RA-07 is not given adequate cost benefit analysis for the environment. RA-07 replaces Line 3 in place by removing the pipe and adding new. This is a great environmental benefit long term to the State of MN. The text

in the various chapters depicts the “costs” to environment of doing RA07 being as great as proposed route. It appears that the “picture” being painted is for the proposed L3R route. Since the pipes in the mainline corridor are aging, the additional space and damage to forests and potential purchase of homes in the immediate work zone could be utilized as a benefit to keep the mainline system routes intact in MN for the future without moving to a new proposed corridor now and into the future. This protects the MPL environment with its last pipeline built in 2008 xwhich supplies the two MN refineries and reduces the risk to MN in general. The existing mainline system corridor pipelines could be groomed for easy replacement over time through the Line 3 Replacement project, executed “in place”. The growth of contaminated sites would be minimized too with containment hopefully in the existing corridor since there are likely spots that will be discovered during the replacement project.

4. Adding RSA-53 to RA-07 makes it very attractive as the second best option to SA04. RSA-53 also lacked substantial analysis. By utilizing RSA 53, along with RA-07 there are a number of factors that are minimized in both the environmental and economics realm. This is important and needs to be looked at from a long-term mainline system replacement plan perspective.
5. SA-04 is not analyzed well from an economic and environmental perspective. The oil company right-of-ways followed by the proposed alternative route are not depicted nor used in the analysis. The widths for right-of-ways are not “apples to apples” comparisons for L3R. The contaminated area numbers should not be a factor for a pipeline being laid in a pipeline right-of-way portion as is the case for SA-04. The oil product flowing in the pipe is not affected by the contaminated soil. It is likely that the number of contaminated sights is high because SA-04 crosses multiple states and is on oil company’s ROW which would have higher numbers of contamination over time due to spills / leaks. The Alliance Pipeline is followed by SA-04 for a large portion of the proposed route. On the Alliance Pipeline website, it says it is owned by Alliance Pipeline L.P. (Alliance USA) who owns the US portion of the Alliance Pipeline System. Sponsors of Alliance USA are affiliates of Enbridge Income Fund Holdings, Inc (50%) and Venesen Inc (50%). The right-of-way data for SA-04 could be analyzed using information from Alliance USA. <https://www.alliancepipeline.com/about-us/documents/maps/marketdeliverymap.pdf>
6. Water Quality is not addressed adequately in a qualitative or quantitative manner.
  - a. There is data available that is being ignored that could enable improved education / decision-making. There are many citizen water quality monitors who sample the lakes and streams not only in Hubbard County but also across the state of MN. The clarity measure is done with the secchi disk provided by the MPCA. The water samples gathered by the citizen monitors using the 2-meter integrated sampler plus phosphorous and chlorophyll-a water samples are taken monthly and are analyzed by RMB Environmental Laboratories each month, May through Sept. Hubbard County lakes just celebrated 20 years of water, including Twin Lakes which you have a spill scenario for. The 20 year report will be available at the end of August 2017. The 15-year report for 39 Hubbard County lakes is found at this link: [http://www.hubbardcolumn.org/uploads/3/4/5/6/34563649/hubbard\\_county\\_summary.pdf](http://www.hubbardcolumn.org/uploads/3/4/5/6/34563649/hubbard_county_summary.pdf).
  - b. Several lakes in Hubbard County monitor for Dissolved Oxygen and Temperature of the water column at one meter increments to the bottom of the lakes to determine how the fish are doing. Suspended Solids are tracked along with Nitrates and Chloride on some lakes.
  - c. There is also a Biotic Index of Invertebrate used to determine the health of the body of water based on the animals it contains that are useful. <http://www.pspb.org/water/media/BioticIndexCard.pdf>

Thank you for the opportunity to comment on Minnesota’s first Draft Environmental Impact Statement for a Pipeline.

Sincerely,

Sharon Natzel

**Levi, Andrew (COMM)**

---

**From:** Lisa Nebenzahl <lnebenzahl@earthlink.net>  
**Sent:** Monday, July 10, 2017 10:28 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** RE: CN-14-196 and PPL15-137

RE: CN-14-196 and PPL15-137

This proposed line directly threatening watersheds connected to the largest and the only certified organic wild rice lakes in Minnesota. This is a bad investment which needs much more study because it threatens our water. This Canadian company gets all the benefit and Americans get all the risk. In addition Enbridge needs to clean up all it's old pipe not just walk away and leave it in the ground for future generations. Please do not poison generations to come.

Thank you,  
Lisa Nebenzahl  
Richfield, MN



# I SUPPORT THE LINE 3 REPLACEMENT PROJECT

FULL NAME

PHONE NUMBER

EMAIL

ADDRESS

CITY, STATE, ZIP

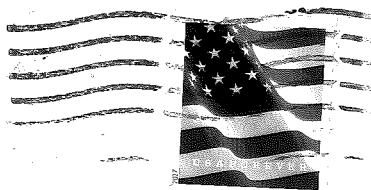
COMMENTS

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS

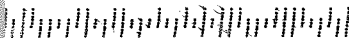
# Line 3 Replacement Project DEIS

- **The Draft Environmental Impact Statement (DEIS) is an in-depth analysis** that took more than 15 months and 27 public meetings to scope and develop.
- **Years of environmental study:** Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- **Infrastructure replacement:** As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137



Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198



## Levi, Andrew (COMM)

---

**From:** Courtney Neifert <ckneifert@gmail.com>  
**Sent:** Monday, July 10, 2017 5:01 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Enbridge should honor the people and lands of MN

I have researched Enbridge and found these concerning details on Wikipedia:

1) "Using data from Enbridge's own reports, the Polaris Institute calculated that 804 spills occurred on Enbridge pipelines between 1999 and 2010. These spills released approximately 161,475 barrels (25,672.5 m<sup>3</sup>) of crude oil into the environment." <https://line9communities.com/history-of-enbridge-spills/>

2) In 2009, Enbridge Energy Partners, a U.S. affiliate of Enbridge Inc., agreed to pay \$1.1 million to settle a lawsuit brought against the company by the state of [Wisconsin](#) for 545 environmental violations.<sup>[29]</sup> In a news release from Wisconsin's Department of Justice, Attorney General J. B. Van Hollen said "...the incidents of violation were numerous and widespread, and resulted in impacts to the streams and wetlands throughout the various watersheds". The violations were incurred while building portions of the company's Southern Access pipeline, a project to transport crude from the [oil sands](#) region in [Alberta](#) to Chicago. <http://www.duluthnewstribune.com/content/enbridge-fined-wisconsin-wetlands-damage>

Pipelines are hard to stop, but if they are going to be approved, the state should demand Enbridge satisfy the wishes of Minnesotans, even though it will cost the company more. Our state should protect the people, including Native Americans, even though their population is small in number. Our state should protect it's precious land and waters.

Line 3 will do little to help Minnesotans- temporary jobs for some, ongoing jobs for few. We will consume little of the energy flowing through the pipes but pay dearly when they leak. Our state should invest in renewable energy and ask fossil fuel and other hazardous waste companies to pay their fair share of the environmental and health impacts of their activities.

Line 3 will help Enbridge make more money for itself and its stock shareholders. Enbridge can afford to build, maintain and inspect regularly a safe pipeline across/under land Minnesotans agree is appropriate while following all environmental regulations.

From: <https://www.thestreet.com/quote/ENB/details/financials.html>

Net Income From Total Operations 2016= \$1.71 Billion  
Stock Price per share 7/10/17= \$39.80  
Stock Dividend per share 7/10/17= \$1.59

Thank you for taking our comments.  
Respectfully,  
Courtney Neifert, Baxter, MN

## Levi, Andrew (COMM)

---

**From:** Courtney Neifert <ckneifert@gmail.com>  
**Sent:** Monday, July 10, 2017 5:00 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Enbridge should honor the people and lands of MN

I have researched Enbridge and found these concerning details on Wikipedia:

1) "Using data from Enbridge's own reports, the Polaris Institute calculated that 804 spills occurred on Enbridge pipelines between 1999 and 2010. These spills released approximately 161,475 barrels (25,672.5 m<sup>3</sup>) of crude oil into the environment." <https://line9communities.com/history-of-enbridge-spills/>

2) In 2009, Enbridge Energy Partners, a U.S. affiliate of Enbridge Inc., agreed to pay \$1.1 million to settle a lawsuit brought against the company by the state of [Wisconsin](#) for 545 environmental violations.<sup>[29]</sup> In a news release from Wisconsin's Department of Justice, Attorney General J. B. Van Hollen said "...the incidents of violation were numerous and widespread, and resulted in impacts to the streams and wetlands throughout the various watersheds". The violations were incurred while building portions of the company's Southern Access pipeline, a project to transport crude from the [oil sands](#) region in [Alberta](#) to Chicago. <http://www.duluthnewstribune.com/content/enbridge-fined-wisconsin-wetlands-damage>

Pipelines are hard to stop, but if they are going to be approved, the state should demand Enbridge satisfy the wishes of Minnesotans, even though it will cost the company more. Our state should protect the people, including Native Americans, even though their population is small in number. Our state should protect it's precious land and waters.

Line 3 will do little to help Minnesotans- temporary jobs for some, ongoing jobs for few. We will consume little of the energy flowing through the pipes but pay dearly when they leak. Our state should invest in renewable energy and ask fossil fuel and other hazardous waste companies to pay their fair share of the environmental and health impacts of their activities.

Line 3 will help Enbridge make more money for itself and its stock shareholders. Enbridge can afford to build, maintain and inspect regularly a safe pipeline across/under land Minnesotans agree is appropriate while following all environmental regulations.

From: <https://www.thestreet.com/quote/ENB/details/financials.html>

Net Income From Total Operations 2016= 1.71

Stock Price per share 7/10/17= \$39.80

Stock Dividend per share 7/10/17= \$1.59

Thank you for taking our comments.

Respectfully,

Courtney Neifert, Baxter, MN

## Levi, Andrew (COMM)

---

**From:** Ken Neihart <kjneihart@gmail.com>  
**Sent:** Sunday, July 09, 2017 6:01 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Public Comment: Line 3 Project ( CN - 14-916 and PPL - 15-137).

### Specific Comments:

#### 1. Certificate of Need.

With the number of oil pipeline corridors in the state and the decline in demand for oil in the state and the country, a close look has to be taken when considering the CON. Since 2004 there has been a decreased demand of oil of 14-19% in Mn. and 4-5% in the country. We don't need any new pipeline corridors. The PUC needs to study/analysis the system of oil pipelines and pipeline corridors in the state and come up with a workable solution to move these oil products through the state using the existing corridors. The cost of mining tar sand oil also needs to be considered. How much longer will it be cost effective to continue mining it.

#### 2. Alternate route SA-04:

SA-04 is mentioned in some sections and tables in the Executive Summary but not in others. Is this route considered to be an alternate? In my opinion, the route is a much safer and environmental sounder route than the other alternatives that are being considered. The other alternative routes travel through a more water-rich environment. Evaluation of SA-04 is missing from the following figures ES-9, ES-10, ES-11, Table ES-4, and sections on Habitat Fragmentation and Impact of Fish and Wildlife Habitat. To complete a fair and objective evaluation, SA-04 needs to be included into these portions of the final EIS.

#### 3. "Stray Current Corrosion":

Stray Current Corrosion describes the effect a high voltage power line can have on a pipeline that is co-located in the same corridor and the risk is increased when the pipeline is located in a water-rich environment such as a swamp, marsh, etc. The stray voltage travels to the pipeline and can cause corrosion in the pipe. A portion of the applicants preferred route is in a utility corridor with a high voltage power line. I didn't see any mention of a "Stray-current Mitigation System" in the DEIS.

#### 4. Economic and Employment:

Minnesota Administration Rules 4410. 2300 (content of EIS) paragraph H requires an EIS to consider environmental, economic, employment and sociological impacts. I didn't see any mention of this in the DEIS. Will this paragraph H be covered in the EIS? The applicants preferred route traverses lake county that depends on tourism year round. This tourism industry has a very large impact on the area's economy and needs to be considered in the EIS.

#### 5. Aromatic Hydrocarbons:

Benzene and toluene are examples of aromatic hydrocarbons. These two chemicals are added to the bitumen (tar sand) to thin the bitumen so it can be transported in a pipeline. When there is a spill the hydrocarbons either evaporate or find their way to the water column or water table. Once in the water table, they are transported with the water. The bitumen usually sinks to the bottom in water and is difficult to remove and in some cases impossible to remove. The aromatic hydrocarbons are carcinogenic solvents. I have a cabin on West Fox Lake which is in Fifty Lakes. Fifty Lakes is 4-6 miles south of the applicants preferred route and the water table flows in a southwest direction so any spill could find its way to the city. It also could find its way to the drinking water of some of the residents who have shallow wells. Daggett Brook also flows south from the proposed pipeline and flows into the Whitefish Chain of lakes passing through a couple lakes in Fifty Lakes.

### General comments:

1. I was disappointed not to see any comments from the DNR or the MPCA. They were supposed to be part of this process! I had expected comments from these two important state agencies. Their comments on this proposed pipeline need to be part of the process. I would suggest devoting a chapter in the EIS to both the DNR and MPCA for their comments on this proposal.
2. I only saw one author of the DEIS listed.
3. Has anyone mentioned the three crude oil pipelines exposed on the Tamarac River?

4. Is there 192 water crossing on the proposed pipeline route?
5. How many other DEIS' has Cardno, Inc. done for the state?
6. What is the maximum number of barrels of oil can be transported in the proposed 36" pipe?

Thank you,  
Ken Neihart

Sent from my iPad

~~John Lee~~ Kristin Neises

Start with old Line 3-

I don't trust Enbridge to clean, pig out, & plug the old pipelines. They have been proven to lack integrity at other times, <sup>(Cass Lake leak)</sup> so the MPCA needs to monitor & report the pipelines to a much greater extent.

There should be scientific studies done regarding soil samples & water samples.

Enbridge should be forced to clean those up before they ~~even~~ think about new projects.

~~Cleanup & removal of the old old Line 3 would also create many jobs. That's what~~

Don't leave your junk in our backyard!



The old corroded, leaking pipes should be totally removed; If Enbridge doesn't want to pay \$1.2 billion to clean it up, who will? ~~The~~

Removal will create many temporary jobs, as well. The jobs created by new line 3 will Proposed New Line 3 disappear to "0" after the proposed Line 3 is finished.

Is most impactful to disturbing wild rice beds & other areas of biodiversity. It goes right under the <sup>beginning of the</sup> Mississippi River. One leak will ruin the river all the way down to the Gulf of Mexico.

<sup>30 year</sup> The social cost of <sup>carbon</sup> ~~refore~~ ~~climate change~~ <sup>is</sup> > ~~\$670 million~~ <sup>\$670 billion</sup>. Instead of pumping dirty oil, why doesn't Enbridge pump money into a sustainable world & clean energy.



There were several broken links in the DEIS,  
Including a link regarding impact to  
Native Americans. There is a disproportionately  
negative impact to Native Americans.

**From:** [kathy neitzke](#)  
**To:** [MN COMM Pipeline Comments](#)  
**Subject:** St. Croix River and water shed  
**Date:** Monday, June 12, 2017 1:34:10 PM

---

To whom it may concern,

Just NO.....No to Unbridge Line 3.

Do not increase the oil flow across our beautiful waterways.

In fact, if the infrastructure for this pipe line is obsolete, shut it down.

Get rid of it entirely. This planet can not continue to sustain the human implications now.

Keep it in the ground to begin with.

Minnesota and Wisconsin are some of the best outdoor playgrounds in our country.

Do you want to vacation where there is oil on the ground and in the water? I don't.

Is it really worth it to line the pockets of the oil companies in order to move oil?

Do you think big oil is going to care if our backyards are ruined? Nope.

I feel like they only care about the bottom line.

It is a matter of time when there will be a spill. It is not worth the price to clean it up....if you can ever clean it up.

Don't allow an expansion of this oil line.

Katherine Neitzke  
Cabin owner in Minnesota  
Resident of Wisconsin  
715-377-6579

Please provide your contact information. This information and your comments will be publicly available.

Name: Jamie Nelson

Street Address: 23636 130th Ave NW

City: Viking State: MN Zip Code: 55760

Phone or Email: 218-889-6842

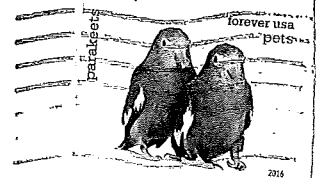
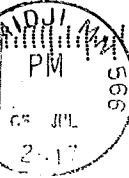
Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

I support the L-3 Project. Oil is something the country needs. We need cheap oil. Pipelines are the cheapest and safest form of transportation. Don't let a small minority decide everyone else's fate. Approve the project!!

## Line 3 Replacement Project DEIS

- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-016; PPL-15-137



Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

### I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                  |              |       |
|------------------|--------------|-------|
| FULL NAME        | PHONE NUMBER | EMAIL |
| KENT NELSON      |              |       |
| ADDRESS          |              |       |
| 30521 CTY 33     |              |       |
| CITY, STATE, ZIP |              |       |
| Akeley MN 56433  |              |       |

#### COMMENTS

Fully support, AS THE majority do.

THE POST OFFICE RETURNED THIS SO I put it in the envelope. You should file a complaint if this is common. Kent Nelson

DECLARE THE DEIS ADEQUATE WITHIN 280 DAYS

**Levi, Andrew (COMM)**

---

**From:** Molly Tranel Nelson <missmolly102@hotmail.com>  
**Sent:** Monday, July 10, 2017 12:38 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** docket numbers CN-14-916 and PPL-15-137

As a citizen of Minnesota, I am very concerned about the proposed new Enbridge line 3 pipeline

My first concern is that routes are proposed that are out of the existing pipeline footprint. The only way to really minimize impacts to environmental resources is by not disturbing new areas. For this reason, using the existing pipeline right of way makes the most sense and does the most to protect the environment.

My second concern is that proposed routes impact several American Indian tribal communities and some of the highest quality water resources in the state, including important wild rice areas.

The only alternative that should be considered is use of the existing right of way where the current Line 3 pipeline resides.

Thank you,

Molly Nelson

## Line 3 Replacement Project DEIS

- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137

Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198



### I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                     |              |       |
|---------------------|--------------|-------|
| FULL NAME           | PHONE NUMBER | EMAIL |
| Robert A. Nelson    |              |       |
| ADDRESS             |              |       |
| SHEVIN 27341 330 ST |              |       |
| CITY, STATE, ZIP    |              |       |
| Shevin, Mn. 56676   |              |       |

COMMENTS

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS

**Levi, Andrew (COMM)**

---

**From:** A. E. Ness <alyssa.e.ness@gmail.com>  
**Sent:** Monday, July 10, 2017 11:11 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** CN-14-916 and PPL-15-137

To whom it may concern:

Regarding CN-14-916 and PPL-15-137, please do not allow this line to put our watersheds at risk. In crossing the Mississippi and the Lake Superior watersheds in Minnesota as well as Anishinaabe territory, we put at risk two of our great bodies of water in this state.

They say that water is the new oil; I'm not sure if this is fully true yet, if we keep feeling the need to prioritize oil needs over water security, but please consider the safety of our watersheds of the utmost importance. We all want to have safe, clean, good places to live, work, and play; I can recognize the economic and "energy needs" pull of oil, but would rather not imagine or have to face the potential consequences, as minuscule as the risks may seem; please keep in mind that a small percent chance is a far cry from a zero percent chance.

Thank you for your careful consideration of this and other comments.

Best regards,

Alyssa Ness  
Lifelong Minnesotan, dependent on clean water

**I SUPPORT THE LINE 3 REPLACEMENT PROJECT**

|                              |              |       |
|------------------------------|--------------|-------|
| FULL NAME                    | PHONE NUMBER | EMAIL |
| Paul E. Netland              | 218-694-6370 |       |
| ADDRESS                      |              |       |
| 29501 201 <sup>st</sup> Ave. |              |       |
| CITY, STATE, ZIP             |              |       |
| Bagley, MN 56621             |              |       |

COMMENTS

**DECLARE THE EIS ADEQUATE WITHIN 280 DAYS**

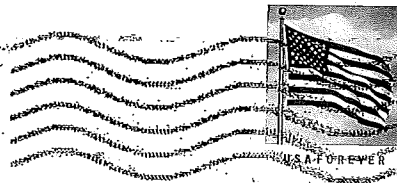
**Line 3 Replacement  
Project DEIS**

- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137

ST PAUL MN 551

14 JUN 2017 PM 3 T



Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198



## Levi, Andrew (COMM)

---

**From:** MacAlister, Jamie (COMM)  
**Sent:** Wednesday, July 19, 2017 12:01 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** FW: Stop Line 3 Abandonment

Jamie MacAlister  
Environmental Review Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 280, Saint Paul, MN 55101  
P: 651-539-1775

CONFIDENTIALITY NOTICE: This message is intended only for the use of the individual(s) named above. Information in this e-mail or any attachment may be confidential or otherwise protected from disclosure by state or federal law. Any unauthorized use, dissemination, or copying of this message is prohibited. If you are not the intended recipient, please refrain from reading this e-mail or any attachments and notify the sender immediately. Please destroy all copies of this communication.

-----Original Message-----

From: Darren Neuman [mailto:neum0072@hotmail.com]  
Sent: Tuesday, June 06, 2017 6:47 PM  
To: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>  
Cc: Darren Neuman <neum0072@hotmail.com>  
Subject: Stop Line 3 Abandonment

Mr Macalister:

I am opposed to abandonment of any pipeline in MN until an approved regulatory strategy is in place to ensure protection of our environment, communities, and citizens. The certificate of need docket is cn-14-916 and the route permit docket is ppl-15-137.

Thank you,  
Darren Neuman  
Grand Rapids, MN

## Levi, Andrew (COMM)

---

**From:** George, Kevin (PUC)  
**Sent:** Wednesday, July 12, 2017 9:49 AM  
**To:** MN\_COMM\_Pipeline Comments  
**Cc:** MacAlister, Jamie (COMM); Kirsch, Raymond (COMM)  
**Subject:** FW: Enbridge pipeline #3- request for support of landowner option of removal as per Grand Rapids City Council request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jamie, Ray,

Not sure if Ms. Neuman also sent this comment to you. I was out of the office Monday afternoon and yesterday and didn't see this. It's dated July 10, however.

Kevin

**Kevin George**  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350 | St. Paul, MN 55101  
(651) 201-2251 | [Kevin.George@state.mn.us](mailto:Kevin.George@state.mn.us) | [mn.gov/puc/](http://mn.gov/puc/)

---

**From:** Patricia Neuman [mailto:neuman@mnstate.edu]  
**Sent:** Monday, July 10, 2017 2:31 PM  
**To:** George, Kevin (PUC) <kevin.george@state.mn.us>  
**Subject:** Enbridge pipeline #3- request for support of landowner option of removal as per Grand Rapids City Council request

Dear Mr. George,

We own homestead property in Grand Rapids that the Enbridge pipeline #3 crosses for multiple acres and is scheduled for abandonment. We are asking your support for giving landowners the option for pipe removal.

Abandoned pipelines have a history of legacy contamination under them, which might be rusting out and changing water flow as well as becoming exposed. We have roughly 16 acres of open and wooded city property tied up because of the pipeline running the entire length. To my knowledge this is the largest piece of residential property in the city which is now heavily devalued & limited in use because of the pipeline. The pipeline not only critically devalues and limits the use of this beautiful piece of property but also severely threatens the environment, the nearby lakes, and water. And certainly exposed pipe which is an eventual likelihood, creates its own set of problems. We had already experienced some problems over the years. As a landowner we have no means of dealing with the known dangers of leaving the pipeline in place and urgently request your assistance in holding Enbridge responsible for giving landowners the option of pipe removal, returning the land to a safe state.

Please also note that we support, and request your support, for the Grand Rapids City council request that the pipeline be removed. Thank you, Paul and Patricia Neuman. 201 NW 17th St. , Grand Rapids MN 55744. 218-301-9540

## Levi, Andrew (COMM)

---

**From:** Kirsch, Raymond (COMM)  
**Sent:** Monday, July 10, 2017 3:52 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Cc:** Kirsch, Raymond (COMM)  
**Subject:** FW: Enbridge Pipeline #3 request giving landowners option for removal per Grand Rapids City Council request

---

**From:** Patricia Neuman [mailto:neuman@mnstate.edu]  
**Sent:** Monday, July 10, 2017 2:26 PM  
**To:** Kirsch, Raymond (COMM) <raymond.kirsch@state.mn.us>  
**Subject:** Enbridge Pipeline #3 request giving landowners option for removal per Grand Rapids City Council request

Dear Mr. Kirsch,

We own homestead property in Grand Rapids that the Enbridge pipeline #3 crosses for multiple acres and is scheduled for abandonment. We are asking your support for giving landowners the option for pipe removal.

Abandoned pipelines have a history of legacy contamination under them, which might be rusting out and changing water flow as well as becoming exposed. We have roughly 16 acres of open and wooded city property tied up because of the pipeline running the entire length. To my knowledge this is the largest piece of residential property in the city which is now heavily devalued & limited in use because of the pipeline. The pipeline not only critically devalues and limits the use of this beautiful piece of property but also severely threatens the environment, the nearby lakes, and water. And certainly exposed pipe which is an eventual likelihood, creates its own set of problems. We had already experienced some problems over the years. As a landowner we have no means of dealing with the known dangers of leaving the pipeline in place and urgently request your assistance in holding Enbridge responsible for giving landowners the option of pipe removal, returning the land to a safe state.

Please also note that we support, and request your support, for the Grand Rapids City council request that the pipeline be removed. Thank you, Paul and Patricia Neuman. 201 NW 17th St. , Grand Rapids MN 55744. 218-301-9540

## Levi, Andrew (COMM)

---

**From:** MacAlister, Jamie (COMM)  
**Sent:** Monday, July 10, 2017 5:08 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** FW: Enbridge pipeline property owner concerns

### Jamie MacAlister

Environmental Review Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 280, Saint Paul, MN 55101  
P: 651-539-1775



**CONFIDENTIALITY NOTICE:** This message is intended only for the use of the individual(s) named above. Information in this e-mail or any attachment may be confidential or otherwise protected from disclosure by state or federal law. Any unauthorized use, dissemination, or copying of this message is prohibited. If you are not the intended recipient, please refrain from reading this e-mail or any attachments and notify the sender immediately. Please destroy all copies of this communication.

---

**From:** Patricia Neuman [mailto:neuman@mnstate.edu]  
**Sent:** Monday, July 10, 2017 2:21 PM  
**To:** MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>  
**Subject:** Enbridge pipeline property owner concerns

Dear Jamie,

We own homestead property in Grand Rapids that the Enbridge pipeline #3 crosses for multiple acres and is scheduled for abandonment. We are asking your support for giving landowners the option for pipe removal.

Abandoned pipelines have a history of legacy contamination under them, which might be rusting out and changing water flow as well as becoming exposed. We have roughly 16 acres of open and wooded city property tied up because of the pipeline running the entire length. To my knowledge this is the largest piece of residential property in the city which is now heavily devalued & limited in use because of the pipeline. The pipeline not only critically devalues and limits the use of this beautiful piece of property but also severely threatens the environment, the nearby lakes, and water. And certainly exposed pipe which is an eventual likelihood, creates its own set of problems. We had already experienced some problems over the years. As a landowner we have no means of dealing with the known dangers of leaving the pipeline in place and urgently request your assistance in holding Enbridge responsible for giving landowners the option of pipe removal, returning the land to a safe state. Please also note that we support, and request your support, for the Grand Rapids City council request that the pipeline be removed. Thank you, Paul and Patricia Neuman. 201 NW 17th St. , Grand Rapids MN 55744. 218-301-9540

**Levi, Andrew (COMM)**

---

**From:** Cecelia Newton <newton.cecelia@gmail.com>  
**Sent:** Friday, July 07, 2017 3:04 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** CN-14-916 and PPL-15-137

To Whom I May Concern,

I am a retired teacher that is concerned with the effects of climate change on the students I taught from 1975 to 2005 in Minneapolis. The DEIS does not consider the possibility of shutting down the current line 3 and constructing no alternative line as a way to support our commitment to climate mitigation goals set by Minnesota legislature.

Cecelia Newton  
5516 Irving Ave. S.  
Minneapolis, MN. 55419

M. H. Nicholas

906 8<sup>th</sup> St. W

Hastings, MN 55033

MAILROOM

JUL 14 2017



RECEIVED

Ray Kirsch, Public Advisor  
Dept. of Commerce, Energy Review and  
Analysis

85 7<sup>th</sup> Place East

St. Paul, MN

55101-2198

10 July 2017

Mr Kirsch

I called this morning to say  
No. You asked that I jot  
down my reasons and have  
it mailed today with today 10 Jul 2017  
post mark. So I scanned <sup>thru</sup> all the  
info I had received re MN Minnesota  
"a guide to the Line 3 Project Public  
meetings for the Draft Environmental Impact  
Statement (EIS) June 2017

CN-14-916 and PPL-15-137

1) Enbridge - History of <sup>being</sup> a  
responsible, honorable and/or reliable  
is horrific and always has been  
able to get out of or have greatly  
reduced penalties.

2) Land owners not only today but for  
years in the future will be responsible  
for the left behind residues (not sure of  
the correct term but it will be the landowner  
not the state, county and/or Enbridge - financially  
UNLESS very explicit terms to cover  
every possible possibility is addressed in  
a new final statement, which

which includes Enbridge is responsible for all costs involved with removing the old line and May Not abandoned

There are others but I have other things I need to do today!

3) I mentioned trucks I see they are too expensive ??

4) What keeps Enbridge - going Bankrupt and/or changing its name. I read they are a Canadian Company who took over <sup>from</sup> previous owners

5) Safety issues - look at Kalamazoo MI our oldest son once lived in Kalamazoo

6) Need for fuel for automobiles - look at the increase in battery not fuel powered vehicles, young people opting to rent a car versus owning a car.

7) Sex trafficking / Drug problems are finally being made aware of - big money for the pimps + providers - for the employees at sites away from family and away from markets + towns, etc.

8) Greed and Power by too many who have "friend who can help with the 'wink, wink'"



**Levi, Andrew (COMM)**

---

**From:** Robin Nicholson <rcrwnicholson@yahoo.com>  
**Sent:** Saturday, July 08, 2017 4:19 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Enbridge Line 3

To Whom It May Concern,  
I am a citizen of Minnesota.

I do not think the DEIS has not shown adequate concern for oil spill safety and other environmental concerns. It violates some some existing rules: MN Statute 103F.305 Scenic River Protection Policy and MN statute 116D.02 Declaration of State Environmental Policy.

All pipeline spill. Why or how can a state even consider allowing this to happen in our state of so many lakes, rivers, marshes, etc.? review the NO BUILD option. Our world is moving away from fossil fuels. Minnesota should do the same.

Thanks for your consideration,  
Sincerely,  
Robin Nicholson

**Levi, Andrew (COMM)**

---

**From:** Libby Nickel Baker <libby.nickel@gmail.com>  
**Sent:** Wednesday, June 14, 2017 4:55 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Milaca Meeting re: Enbridge Pipeline

Hello-

I'm just writing to ask if anyone bothered to consult anyone in Mille Lacs County about when would be the best time to schedule these meetings to ensure education for residents of Milaca and surrounding areas about the new pipeline that might be built in their backyard.

It is, of course, a rhetorical question.

Milaca is the county seat of Mille Lacs County. Milaca's Gateway to the Northland festival parade, a parade attended by thousands of people, a parade that draws 20+ marching bands from all over the state of Minnesota just happens to start 30 minutes before the Enbridge Pipeline meeting at the Phoenix Event Center tomorrow. And I don't think that's a coincidence.

Hundreds of kids are involved in the marching band program at Milaca Public Schools, not to mention Foley, Princeton and other school districts near Milaca who will be marching in this parade. If one assumes that at least one parent of these children will want to watch their kids perform, that's hundreds of adults who will be otherwise engaged tomorrow night.

Also, this parade is the only parade where all three Milaca bands march. So how many Milaca parents whose kids have been working for over a month are going to skip the parade to talk to anyone about an oil pipeline in their backyard? Few to none. And if they have day jobs, they can't attend the Foley or Mora meetings either.

Because I have a full-time job and will be at the parade, watching my stepchildren perform, and hosting my family members who are coming to town to watch our hometown festival parade, I will not be able to attend any of the meetings.

Can you please send me the literature (.pdf of a fact sheet, etc.) that will be distributed at the Open House so that I can educate myself and make any informed comments by your July 10 deadline?

Thank you,  
Libby Nickel Baker

--

Libby Nickel Baker  
[libby.nickel@gmail.com](mailto:libby.nickel@gmail.com)

Line 3 DEIS comments: Docket #'s: CN-14-916 & PPL-15-137

#### Abandonment:

The DEIS states that Enbridge has indicated that it would develop of a contaminated sites management plan to identify, manage and mitigate historically contaminated soils and waters found during the abandonment or removal of the existing Line 3 (8.3.1.1.1) Where is the actual plan???

#### Construction and Restoration:

Cathodic protection will not be installed for up to 1 year after pipeline completion (2.3.2.3). Lack of cathodic protection is the causative factor in many pinhole pipeline leaks. The proposed route follows a utility corridor for much of its length. This is unacceptable.

#### Economic Impacts:

Chapter 5 states that line 3 will create ZERO permanent jobs. Enbridge's application states that existing operations staff will be able to operate the pipeline and that few additional employees would be hired to assist the staff. Zero construction jobs will go to Minnesota. (5.3.4)

#### Climate Change:

(Executive Summary pg 18) The DEIS acknowledges that Line 3 would contribute to climate change through analysis of 3 different types of emissions: direct, indirect and lifecycle. The direct and indirect emissions alone would be about 453,000 tons of CO<sub>2</sub> per year, costing approx. \$478 billion over a 50 year life span.

The DEIS does not discuss the unprecedented challenges of human casualty, displacement, conflict, natural disaster, biodiversity loss, etc., that climate change is causing, OR the consensus from the Scientific communities that we must leave fossil fuels in the ground. It also fails to acknowledge that across the planet, indigenous people are disproportionately impacted.

Chapter 9 states that ANY of the possible routes for line 3 "would have a long term detrimental effect on tribal members and tribal resources." It also states that "traditional resources are essential to the maintenance and realization of tribal lifeways, and their destruction or damage can have profound consequences." Why is that finding not reason enough to stop this plan???

Chapter 11.4.1: The DEIS acknowledges that "The addition of a temporary, cash rich workforce increases the likelihood that sex trafficking and/or sexual abuse will occur." Asking Enbridge to prepare and implement an educational plan or awareness campaign to address this issue is not likely to change the outcome. Perhaps you haven't noticed the connection between the rape of women and the rape of the planet's resources yet, but it's there, please wake up...

#### Specific comments:

History shows that Enbridge continually violates permit conditions. Promises of Enbridge pledges to do this or that without a concrete action plan should not be accepted.

Alternatives to the pipeline are ludicrous. Our focus needs to be on replacing fossil fuels with renewable, sustainable resources; wind, solar, geothermal...all will provide jobs.

We all know pipelines leak – we are at the point that ANY leak is unacceptable. The probability of spills on the proposed route shows that in 50 years we could expect 14 pinhole leaks, 54 small leaks, 4 medium, 3 large and 1 catastrophic...

Thank you, Karen Nielsen

**Levi, Andrew (COMM)**

---

**From:** Helen Nikiel <hnikiel@comcast.net>  
**Sent:** Wednesday, July 05, 2017 9:34 AM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Line 3 proposed by Enbridge

Hello,

My name is Helen Nikiel and I am a resident of Bloomington in the great state of Minnesota. I am writing as a person of faith and as a concerned human being regarding the new Line 3 proposed by Enbridge.

How many times do we have to go through this argument? I don't care how "safe" pipelines are touted to be. It only takes one incident, one leak, to endanger the health of our precious environment and, in turn, the health of all of us who live here.

It is also a source of deep embarrassment to me, as it should be to all of us, that our Native communities continue to endure the impact of extracting and transporting oil (that in my humble opinion should stay in the ground).

We have a responsibility to keep our environment healthy to sustain our current and future generations. Please accept that responsibility and reject Line 3.

Thank you for this opportunity to speak out,

Helen Nikiel  
Bloomington, MN

ST PAUL

MIN 550

## Line 3 Replacement Project DEIS

- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137

NEOPOST

FIRST-CLASS MAIL

06/23/2017

US POSTAGE

\$000.34<sup>0</sup>



ZIP: 55802  
041L10259005

Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

### I SUPPORT THE LINE 3 REPLACEMENT PROJECT

FULL NAME

PHONE NUMBER

EMAIL

David J Nindorf 218 428 7372

ADDRESS

2525 E 7<sup>th</sup> ST

CITY, STATE, ZIP

Superior WI 54880

COMMENTS

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS

# I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                     |              |                          |
|---------------------|--------------|--------------------------|
| FULL NAME           | PHONE NUMBER | EMAIL                    |
| Rachael Nadeau      | 218-766-9032 | thompsonra2013@gmail.com |
| ADDRESS             |              |                          |
| 2160 State St       |              |                          |
| CITY, STATE, ZIP    |              |                          |
| Longville, MN 56655 |              |                          |

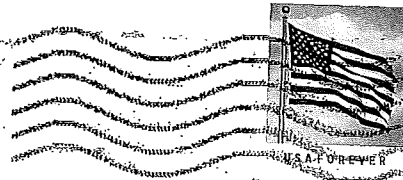
COMMENTS: Please comply within 280 days for EIS

DECLARE THIS INSUFFICIENT WITHIN 280 DAYS

## Line 3 Replacement Project DEIS

ST PAUL MN 551

JUN 2017 PM 8 T



- The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.
- Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.
- Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137

Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

**Levi, Andrew (COMM)**

---

**From:** HeatherR Nord <heathernord01@hotmail.com>  
**Sent:** Monday, July 10, 2017 2:54 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** CN-14-196 and PPL15-137

Greetings,

Thank you for your attention to this very important matter. We all appreciate that the state of Minnesota represents the people and your actions will be historic.

I am writing regarding CN-14-196 and PPL15-137.

I am writing in opposition to and with concern to the Line 3 proposal. Although called a replacement this new Enbridge pipe has a larger capacity to transport tar sands oil pipeline through sensitive Minnesota wetlands. This line adversely affects native communities - directly threatening watersheds connected to the largest and the only certified organic wild rice lakes in Minnesota. Native communities have treaty rights and I believe the tribes need clear and informed consent before any project of this magnitude be allowed to be built.

Line 3 has already had a 1.7 million gallon spill in 1991. This kind of project is documented to FAIL and yet the state is considering a larger capacity line? This does fit our image of the land of 10,000 lakes. We will be the land of 10,000 leaks. We love our rivers and lakes. They are more valuable than oil. Please do not take this lightly.

This is a bad investment which needs much more study because it threatens our water. This Canadian company gets all the benefit and American's get all the risk. In addition Enbridge needs to clean up all it's old pipe and not leave it in the ground for future generations. The city of Grand Rapids has asked Enbridge to remove their pipe because it is the wise thing to do. The state of Minnesota needs to ask for this to be a statewide policy.

Minnesota has already lost a large percentage of it's clean water to agriculture. The fossil fuel industry does not need this pipeline as the marketplace will naturally phase out tar sands oil production due to it's costs to the environment. I don't believe the risk is worth the perceived reward. There are more jobs with the development of clean and renewable energy and at this point, I believe, we need to move in that direction or perish.

Sincerely,  
Heather R Nord

## Levi, Andrew (COMM)

---

**From:** PUC, Docketing (PUC)  
**Sent:** Monday, July 10, 2017 2:58 PM  
**To:** HeatherR Nord  
**Cc:** MN\_COMM\_Pipeline Comments  
**Subject:** RE: CN-14-196 and PPL15-137

Please send comments to : [Pipeline.Comments@state.mn.us](mailto:Pipeline.Comments@state.mn.us) I am ccing now, thank you

---

**From:** HeatherR Nord [mailto:heathernord01@hotmail.com]  
**Sent:** Monday, July 10, 2017 2:52 PM  
**To:** PUC, Docketing (PUC) <docketing.puc@state.mn.us>  
**Subject:** CN-14-196 and PPL15-137

Greetings,

Thank you for your attention to this very important matter. We all appreciate that the state of Minnesota represents the people and your actions will be historic.

I am writing regarding CN-14-196 and PPL15-137.

I am writing in opposition to and with concern to the Line 3 proposal. Although called a replacement this new Enbridge pipe has a larger capacity to transport tar sands oil pipeline through sensitive Minnesota wetlands. This line adversely affects native communities - directly threatening watersheds connected to the largest and the only certified organic wild rice lakes in Minnesota. Native communities have treaty rights and I believe the tribes need clear and informed consent before any project of this magnitude be allowed to be built.

Line 3 has already had a 1.7 million gallon spill in 1991. This kind of project is documented to FAIL and yet the state is considering a larger capacity line? This does not fit our image of the land of 10,000 lakes. We will be the land of 10,000 leaks. We love our rivers and lakes. They are more valuable than oil. Please do not take this lightly.

This is a bad investment which needs much more study because it threatens our water. This Canadian company gets all the benefit and American's get all the risk. In addition Enbridge needs to clean up all it's old pipe and not leave it in the ground for future generations. The city of Grand Rapids has asked Enbridge to remove their pipe because it is the wise thing to do. The state of Minnesota needs to ask for this to be a statewide policy.

Minnesota has already lost a large percentage of it's clean water to agriculture. The fossil fuel industry does not need this pipeline as the marketplace will naturally phase out tar sands oil production due to it's costs to the environment. I don't believe the risk is worth the perceived reward. There are more jobs with the development of clean and renewable energy and at this point, I believe, we need to move in that direction or perish.

Sincerely,  
Heather R Nord



Please provide your contact information. This information and your comments will be publicly available.

Name: Patricia Norman

Street Address: 2225 W 24th St.

City: Duluth State: MN Zip Code: 55811

Phone or Email: normanduluth@gmail.com

Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

Improved statement regarding the Department of Justice's Consent Decree creating a Federal Law mandating the replacement of the aging Line 3. This Federal Law between the Federal Government and Enbridge requires the Line 3 be replaced to ensure the environment is protected and the threat of an aging line has been removed.

## Levi, Andrew (COMM)

---

**From:** Kirsch, Raymond (COMM)  
**Sent:** Monday, July 10, 2017 9:07 AM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** FW: Comments Enbridge Line 3 DEIS below and copy attached  
**Attachments:** Line3 DEIS Lois cmts 7-10-17.pdf

**From:** Lois Norrgard [mailto:lnorrgard01@gmail.com]  
**Sent:** Monday, July 10, 2017 9:06 AM  
**To:** Kirsch, Raymond (COMM) <raymond.kirsch@state.mn.us>  
**Subject:** Comments Enbridge Line 3 DEIS below and copy attached

Please find comments to the Line 3 DEIS below and copy attached.

TO: Department of Commerce, Energy Environmental Review and Analysis

Ray Kirsch, Public Advisor  
DOC-EERA  
85 7<sup>th</sup> Place East  
St Paul Minnesota 55101  
[Raymond.kirsch@state.mn.us](mailto:Raymond.kirsch@state.mn.us)

### **RE: Public Comment for Enbridge Line 3 pipeline DEIS, 7-10-2017**

I am writing today as a citizen of Minnesota and affected landowner with property downstream for the proposed pipeline along the Kettle River. I have grave concerns regarding the adequacy and the lack of analysis contained within the Draft Environmental Impact Statement (DEIS) for the Enbridge Line 3 replacement project.

#### **I. General concerns**

I am concerned with wildlife impacts and did not find an in depth assessment of impacts to Threatened and Endangered species, Minnesota species of special concern, aquatic resources (other than just fish) and pollinators, contained in the DEIS. I am also concerned about the extensive impacts to water and wild rice.

One comment that I feel holds true throughout the DEIS - you cannot expect just mentioning a word will be considered the "hard look" that NEPA requires.

#### **Climate Change:**

I request that there be a robust analysis of the GHGs from the product traveling within the pipeline – this must be a full life cycle analysis that includes the increased carbon debt of moving 390,000 barrels per day presently, as well as the increased carbon threats and risks of a new pipeline moving 760,000 barrels per day would cause to our changing climate. The burning of this carbon will add to the existing overload that we have in our atmosphere, will add to the existing extreme weather and

drought, existing impacts to agriculture, wildlife and their habitats, water quality, and human homes and communities that we are presently seeing here in Minnesota and across the world.

The science was not in existence and GHG impact was not assessed 50 years ago when the original Line 3 pipeline was first built – we now have the chance to remedy this HUGE oversight. This DEIS cannot be considered final without a life cycle analysis the increased burning and by products of the tar sands oil that will flow through this pipeline will bring to our world. The DEIS also does not address the loss of carbon from this project in our wetlands and forest soils due to this project. We must protect and increase carbon sequestered in our natural areas.

Minnesota is committed by statute to do its part for the climate by meeting its Next Generation Energy Act goals. This 2007 law requires the state cut its annual emissions of greenhouse gases by 80% between 2005 and 2050. We must prevent the problem from getting worse – this is not some far off in the future priority or need – this is TODAY.

The need for action is clear: Minnesota is already feeling the impacts of climate change. We have experienced four 1,000-year rainfalls since 2002. We have watched our spruce, fir, aspen, and birch forests retreat northward. And air pollution related to greenhouse gas emissions annually cost us more than \$800 million in increased health care costs. *(information taken from CSEO report)*

#### **Justice:**

Most importantly - admitted in these documents any of the routes would have a disproportionate and adverse effect on tribal resources and members - It is inconceivable to me that that we are even considering moving forward with this project at all. This analysis and public involvement process cannot be considered adequate without a full, robust, and credible consultation with the tribes affected. And true and proper steps to ensure safety and protection of cultural resources today and into the future. I emphatically believe that if this were done, we would find this project far to “costly” to ever move forward.

#### **750 foot corridor:**

##### **DEIS lacks adequate analysis for why this is necessary**

Why does the company request a 750 foot wide corridor? Well over two football fields wide corridor – what land clearing, wetland impacts, chemical treatments, tree removal, and other environmental disturbance will occur in this corridor? This is not adequately detailed in the DEIS, this must be remedied before this document can be considered final. What are the future plans for why they are requesting such a wide corridor? This DEIS must be redone if this is for additional pipeline construction in future. Future plans for additional lines would be connected actions and must be analyzed in this DEIS. What is being done about Line 1, 2, and 4 – all of the same age as Line 3? The need for why a 750’ wide corridor must be clearly identified. Presently there are 7 pipelines in the Line 3 corridor in an easement width of 200 feet. Why the discrepancy?

#### **Missing Alternative that must be analyzed:**

One missing alternative that merits analysis and review would be a Line 3 continued use with a planned sunset, and transition alternative. This is what the citizens’ of MN, US, and all the other species we share this planet with are really looking for.

To meet the state’s 2050 goal, the state needs to immediately begin to implement long-term strategies that reduce fossil fuel use in vehicles.

Continue Line 3: We need an alternative that takes a hard look at 3 more years or some assessed timeframe continued use. Then decommission properly - NOT ABANDONMENT. For all of the reasons laid out in the Summary doc – especially the fact that this pipeline over time would continue to disintegrate and break down – become a conduit for water flow, possibly draining wetlands like farm tile, and buoyancy concerns.

The Summary shows that continuing the existing pipeline is possible. I advocate only allowing this with a comprehensive and robust analysis and plan put into place to ratchet down our use of the toxic tar sands that travel through it – a plan to transition to clean renewable energy, and alternative transportation choices. This review has been started in the Climate Solutions and Economic Opportunities (CSEO) Report from 2016. An assessment could provide a framework to allow ongoing operation of the existing Line 3 to a sunset date and new far-reaching plan for Minnesota's future. **While this framework would require heightened integrity work and progressive decreases in operating pressure, continued operation of existing Line 3 is possible.**

There are a myriad of resources that can be included in this far reaching Alternative. Some I suggest:

Our own Environmental Quality Board's Climate Solutions and Economic Opportunities Report (2016).  
[https://www.eqb.state.mn.us/sites/default/files/documents/CSEO\\_EQB\\_0.pdf](https://www.eqb.state.mn.us/sites/default/files/documents/CSEO_EQB_0.pdf)

We are moving beyond fossil fuel vehicles:

#### **Signs For Fast-Charging Stations Now On I-94 In Minnesota**

*June 15, 2017 3:03 PM*

**Filed Under:** [Electric Cars](#), [Interstate 94](#)

**MINNEAPOLIS (WCCO)** – *Not sure where you can charge an electric car along Interstate 94 in northern Minnesota? Well, now there's some easy-to-spot roadside answers.*

*MnDOT announced Thursday that new "Electric Vehicle Charging Stations" signs are up on the interstate north of St. Cloud, telling motorists where they can find public, fast-charging stations nearby.*

*Expect to see similar signs on other parts of I-94 in the near future.*

*A stretch of the interstate from the Fargo area to Huron, Michigan, is designated as the "Great Lakes Zero Emission Corridor," part of a federal effort to promote alternative fuels.*

*I-94 is one of 55 roadways in the U.S. designated as an "alternative fuel corridor." A network of such corridors was created under the 2016 Fixing America's Surface Transportation Act, and it spans 35 states and covers 85,000 miles.*

*Charlie Zelle, the Minnesota Department of Transportation Commissioner, said in a news release that supporting electric cars on major Minnesota roads like I-94 is important because the leading cause of greenhouse gas emissions in the U.S. is transportation-related.*

*"By identifying where fueling stations can be found, we can increase the use of electric vehicles and improve air quality and meet the needs of current and future motorists," he said.*

MPR ran a story recently that Volvo is switching to all electric engines by 2019. The era of internal combustion engines is over they say. They are joining BMW and Audi in developing electric cars. The story also cited tighter emission standards in Europe that will be difficult to meet with the fossil fuel engines.

The oil industry is slowing production – wonderful news!:

[US oil production boom to cool down amid low oil prices](#)

Depressed oil prices and a shortage of labor and equipment could force US drillers to scale back production and cut rigs in less-profitable plays such as the Bakken Shale, whereas rig growth in the Permian Basin will likely flatline. However, analysts don't expect a dramatic slowdown in production unless oil prices fall into the low-\$30 range.

[Houston Chronicle \(tiered subscription model\)](#) (6/20)

## **OIL MARKETS**

**Enthusiasm wanes as crude glut remains stubbornly high**

**Nathanial Gronewold, E&E News reporter**

*Published: Thursday, June 15, 2017*

Industry is also coming on board with this new future we must embrace.

## **OIL AND GAS**

**Shell CEO wants climate risks disclosed**

Published: Thursday, July 6, 2017

Facing shareholders' pressure to lessen his company's carbon footprint, the CEO of Royal Dutch Shell PLC acknowledged that firms need to reveal more about how they'll deal with climate change's threats to the global economy.

"It is right that it should be transparent which companies are truly on firm foundations over the long-term," CEO Ben van Beurden wrote in a LinkedIn post.

Shell, one of the world's biggest oil and gas companies, has said it assesses climate risks internally. But the firm hasn't detailed the exposure it could face from such risks.

Last week, Shell joined a Group of 20 task force seeking a framework to better assess and price climate-related risks ([\*Climatewire\*](#), June 29).

Van Beurden said Shell will help the group find a way to disclose commercially sensitive data (Karolin Schaps, [Reuters](#), July 4). — AAA

I request that an additional Alternative – Future First Alternative be given adequate analysis and credible discussion in the EIS.

### **Abandonment is not the answer:**

Presently Line 3 has necessitated more than 950 excavations in the last 16 years. In addition, Line 3 is over 50 years old and has integrity problems. This pipeline is breaking down – we cannot leave it to future taxpayers to clean up the mess. Enbridge has had the benefit of operating and profiting on this line for many years – and should as a “good citizen” company fulfill a commitment to the state to properly address the end of life cycle as well. The benefits of proper decommissioning far outweigh any risks from the actual process to do so. Enbridge has shown over and over again that they are able to work within the confines of the easement for the many integrity failures and maintenance required – they have proven that this is possible.

In Minnesota, for the protection of our amazing natural environment and water resources, we must require a proper decommission process that reflects the process done in Canada. Closure and removal is the only answer. The price tag of \$1.28 billion is small in comparison to the future risk and multiple threats that leaving this mess in place will bring to our state – plus \$1.28 billion will create jobs for people today, good moral jobs that help to move us to a good future.

Abandonment is only saying to the cities, counties and citizens along the existing pipeline that this is their problem. Enbridge has a proven track record of not monitoring their pipes that are flowing – there is no guarantee, in fact much data to the contrary, that they would continue to maintain and monitor a pipeline that has been “abandoned”.

### **More analysis that must be done before a final EIS, missing from the DEIS**

- The impact to communities in Alberta Canada due to tar sands extraction. This must be part of our proper and moral life cycle analysis for this project. The tar sands are huge deposits of bitumen, a tar-like substance that’s turned into oil through complex and energy-intensive processes that cause widespread environmental damage. These processes [pollute the Athabasca River](#), lace the air with toxins and convert farmland into wasteland. Large areas of the [Boreal forest](#) are clearcut to make way for development in the tar sands, the fastest growing source of greenhouse gas emissions in Canada.

I am also concerned with the [social](#) and [health costs](#) of the tar sands. First Nations communities in the tar sands report unusually high levels of rare cancers and autoimmune diseases. Their traditional way of life is threatened. Substance abuse, suicide, gambling and family violence have increased in the tar sands region. Meanwhile, the thousands of workers brought in by oil companies face the boom and bust cycles of the oil economy rollercoaster.

- health effects from spills, the carcinogens, from the tar sands dilbit itself as well as the diluent.

- water and the effects from spills which have been known to reach 35 miles downstream from an occurrence. This is of special concern due to the connection from a pipeline crossing to the Kettle

River. There is no spill assessment for the St Louis River, or Nemadji River. There are approx. 80 water crossings – streams, rivers, lakes. The water quality and risk analysis is wholly inadequate.

- analysis that reaches further into the future is necessary. It appears that this DEIS looks only out to about 30 years for risk assessments, this is not adequate.

- frequency of spills – this needs to be further analyzed – it appears from the data that there is an expected risk of a spill every 4 years – this means 25% chance of a spill each year. This is far too high a risk for Minnesota.

## In Conclusion

This project is the wrong direction for Minnesota. I urge us to look to the future and our need to stop using fossil fuels if we want to have a healthy planet for us as well as our fellow creatures. I urge the state to take a hard look at a greater range of realistic and doable alternatives. Alternatives that do not lock us into a future of a more high capacity, extremely risky, way too expensive fossil fuel infrastructure that will be, should be, obsolete in ten years. We need to ramp down our use of toxic tar sands and move to alternatives.

What would our Planet say if she were able submit comments here today? Perhaps our planet would say – I have been your best friend since the Industrial Revolution. I have done all I can to dampen and absorb. I have tried to keep the Arctic and permafrost intact. I have sent you no invoices.

But this is about to change. Like no other generation before us we have the knowledge, technology, money and capacity to save our planet. It's a win-win, investment in green solutions creates new jobs. Sustainability has become a business case. And in the longer term, the low-carbon growth story is the only growth story on offer.

Thank you for the time to submit comments here today.

Sincerely,

Lois Norrgard

10368 Columbus Circle, Bloomington MN 55420 [lnorrgard01@gmail.com](mailto:lnorrgard01@gmail.com)

TO: Department of Commerce, Energy Environmental Review and Analysis

Ray Kirsch, Public Advisor  
DOC-EERA  
85 7<sup>th</sup> Place East  
St Paul Minnesota 55101  
Raymond.kirsch@state.mn.us

RE: Public Comment for Enbridge Line 3 pipeline DEIS, 7-10-2017

I am writing today as a citizen of Minnesota and affected landowner with property downstream for the proposed pipeline along the Kettle River. I have grave concerns regarding the adequacy and the lack of analysis contained within the Draft Environmental Impact Statement (DEIS) for the Enbridge Line 3 replacement project.

#### I. General concerns

I am concerned with wildlife impacts and did not find an in depth assessment of impacts to Threatened and Endangered species, Minnesota species of special concern, aquatic resources (other than just fish) and pollinators, contained in the DEIS. I am also concerned about the extensive impacts to water and wild rice.

One comment that I feel holds true throughout the DEIS - you cannot expect just mentioning a word will be considered the "hard look" that NEPA requires.

#### **Climate Change:**

I request that there be a robust analysis of the GHGs from the product traveling within the pipeline – this must be a full life cycle analysis that includes the increased carbon debt of moving 390,000 barrels per day presently, as well as the increased carbon threats and risks of a new pipeline moving 760,000 barrels per day would cause to our changing climate. The burning of this carbon will add to the existing overload that we have in our atmosphere, will add to the existing extreme weather and drought, existing impacts to agriculture, wildlife and their habitats, water quality, and human homes and communities that we are presently seeing here in Minnesota and across the world.

The science was not in existence and GHG impact was not assessed 50 years ago when the original Line 3 pipeline was first built – we now have the chance to remedy this HUGE oversight. This DEIS cannot be considered final without a life cycle analysis the increased burning and by products of the tar sands oil that will flow through this pipeline will bring to our world. The DEIS also does not address the loss of carbon from this project in our wetlands and forest soils due to this project. We must protect and increase carbon sequestered in our natural areas.

Minnesota is committed by statute to do its part for the climate by meeting its Next Generation Energy Act goals. This 2007 law requires the state cut its annual emissions of greenhouse gases by 80% between 2005 and 2050. We must prevent the problem from getting worse – this is not some far off in the future priority or need – this is TODAY.

The need for action is clear: Minnesota is already feeling the impacts of climate change. We have experienced four 1,000-year rainfalls since 2002. We have watched our spruce, fir, aspen, and birch forests retreat northward. And air pollution related to greenhouse gas emissions annually cost us more than \$800 million in increased health care costs. (*information taken from CSEO report*)



**Justice:**

Most importantly - admitted in these documents any of the routes would have a disproportionate and adverse effect on tribal resources and members - It is inconceivable to me that that we are even considering moving forward with this project at all. This analysis and public involvement process cannot be considered adequate without a full, robust, and credible consultation with the tribes affected. And true and proper steps to ensure safety and protection of cultural resources today and into the future. I emphatically believe that if this were done, we would find this project far too "costly" to ever move forward.

**750 foot corridor:****DEIS lacks adequate analysis for why this is necessary**

Why does the company request a 750 foot wide corridor? Well over two football fields wide corridor – what land clearing, wetland impacts, chemical treatments, tree removal, and other environmental disturbance will occur in this corridor? This is not adequately detailed in the DEIS, this must be remedied before this document can be considered final. What are the future plans for why they are requesting such a wide corridor? This DEIS must be redone if this is for additional pipeline construction in future. Future plans for additional lines would be connected actions and must be analyzed in this DEIS. What is being done about Line 1, 2, and 4 – all of the same age as Line 3? The need for why a 750' wide corridor must be clearly identified. Presently there are 7 pipelines in the Line 3 corridor in an easement width of 200 feet. Why the discrepancy?

**Missing Alternative that must be analyzed:**

One missing alternative that merits analysis and review would be a Line 3 continued use with a planned sunset, and transition alternative. This is what the citizens' of MN, US, and all the other species we share this planet with are really looking for.

To meet the state's 2050 goal, the state needs to immediately begin to implement long-term strategies that reduce fossil fuel use in vehicles.

Continue Line 3: We need an alternative that takes a hard look at 3 more years or some assessed timeframe continued use. Then decommission properly - NOT ABANDONMENT. For all of the reasons laid out in the Summary doc – especially the fact that this pipeline over time would continue to disintegrate and break down – become a conduit for water flow, possibly draining wetlands like farm tile, and buoyancy concerns.

The Summary shows that continuing the existing pipeline is possible. I advocate only allowing this with a comprehensive and robust analysis and plan put into place to ratchet down our use of the toxic tar sands that travel through it – a plan to transition to clean renewable energy, and alternative transportation choices. This review has been started in the Climate Solutions and Economic Opportunities (CSEO) Report from 2016. An assessment could provide a framework to allow ongoing operation of the existing Line 3 to a sunset date and new far-reaching plan for Minnesota's future.

**While this framework would require heightened integrity work and progressive decreases in operating pressure, continued operation of existing Line 3 is possible.**

There are a myriad of resources that can be included in this far reaching Alternative. Some I suggest:

Our own Environmental Quality Board's Climate Solutions and Economic Opportunities Report (2016).  
[https://www.eqb.state.mn.us/sites/default/files/documents/CSEO\\_EQB\\_0.pdf](https://www.eqb.state.mn.us/sites/default/files/documents/CSEO_EQB_0.pdf)

We are moving beyond fossil fuel vehicles:

## **Signs For Fast-Charging Stations Now On I-94 In Minnesota**

*June 15, 2017 3:03 PM*

**Filed Under:** [Electric Cars](#), [Interstate 94](#)

**MINNEAPOLIS (WCCO)** – Not sure where you can charge an electric car along Interstate 94 in northern Minnesota? Well, now there's some easy-to-spot roadside answers.

MnDOT announced Thursday that new "Electric Vehicle Charging Stations" signs are up on the interstate north of St. Cloud, telling motorists where they can find public, fast-charging stations nearby.

Expect to see similar signs on other parts of I-94 in the near future.

A stretch of the interstate from the Fargo area to Huron, Michigan, is designated as the "Great Lakes Zero Emission Corridor," part of a federal effort to promote alternative fuels.

I-94 is one of 55 roadways in the U.S. designated as an "alternative fuel corridor." A network of such corridors was created under the 2016 Fixing America's Surface Transportation Act, and it spans 35 states and covers 85,000 miles.

Charlie Zelle, the Minnesota Department of Transportation Commissioner, said in a news release that supporting electric cars on major Minnesota roads like I-94 is important because the leading cause of greenhouse gas emissions in the U.S. is transportation-related.

"By identifying where fueling stations can be found, we can increase the use of electric vehicles and improve air quality and meet the needs of current and future motorists," he said.

MPR ran a story recently that Volvo is switching to all electric engines by 2019. The era of internal combustion engines is over they say. They are joining BMW and Audi in developing electric cars. The story also cited tighter emission standards in Europe that will be difficult to meet with the fossil fuel engines.

The oil industry is slowing production – wonderful news!:

## **[US oil production boom to cool down amid low oil prices](#)**

Depressed oil prices and a shortage of labor and equipment could force US drillers to scale back production and cut rigs in less-profitable plays such as the Bakken Shale, whereas rig growth in the Permian Basin will likely flatline. However, analysts don't expect a dramatic slowdown in production unless oil prices fall into the low-\$30 range.

[Houston Chronicle \(tiered subscription model\)](#) (6/20)

## **OIL MARKETS**

### **Enthusiasm wanes as crude glut remains stubbornly high**

Nathanial Gronewold, E&E News reporter

*Published: Thursday, June 15, 2017*

Industry is also coming on board with this new future we must embrace.

## **OIL AND GAS**

## **Shell CEO wants climate risks disclosed**

Published: Thursday, July 6, 2017

Facing shareholders' pressure to lessen his company's carbon footprint, the CEO of Royal Dutch Shell PLC acknowledged that firms need to reveal more about how they'll deal with climate change's threats to the global economy.

"It is right that it should be transparent which companies are truly on firm foundations over the long-term," CEO Ben van Beurden wrote in a LinkedIn post.

Shell, one of the world's biggest oil and gas companies, has said it assesses climate risks internally. But the firm hasn't detailed the exposure it could face from such risks.

Last week, Shell joined a Group of 20 task force seeking a framework to better assess and price climate-related risks ([\*Climatewire\*](#), June 29).

Van Beurden said Shell will help the group find a way to disclose commercially sensitive data (Karolin Schaps, [\*Reuters\*](#), July 4). — **AAA**

I request that an additional Alternative – Future First Alternative be given adequate analysis and credible discussion in the EIS.

### **Abandonment is not the answer:**

Presently Line 3 has necessitated more than 950 excavations in the last 16 years. In addition, Line 3 is over 50 years old and has integrity problems. This pipeline is breaking down – we cannot leave it to future taxpayers to clean up the mess. Enbridge has had the benefit of operating and profiting on this line for many years – and should as a “good citizen” company fulfill a commitment to the state to properly address the end of life cycle as well. The benefits of proper decommissioning far outweigh any risks from the actual process to do so. Enbridge has shown over and over again that they are able to work within the confines of the easement for the many integrity failures and maintenance required – they have proven that this is possible.

In Minnesota, for the protection of our amazing natural environment and water resources, we must require a proper decommission process that reflects the process done in Canada. Closure and removal is the only answer. The price tag of \$1.28 billion is small in comparison to the future risk and multiple threats that leaving this mess in place will bring to our state – plus \$1.28 billion will create jobs for people today, good moral jobs that help to move us to a good future.

Abandonment is only saying to the cities, counties and citizens along the existing pipeline that this is their problem. Enbridge has a proven track record of not monitoring their pipes that are flowing – there is no guarantee, in fact much data to the contrary, that they would continue to maintain and monitor a pipeline that has been “abandoned”.

### **More analysis that must be done before a final EIS, missing from the DEIS**

- The impact to communities in Alberta Canada due to tar sands extraction. This must be part of our proper and moral life cycle analysis for this project. The tar sands are huge deposits of bitumen, a tar-like substance that's turned into oil through complex and energy-intensive processes that cause

widespread environmental damage. These processes [pollute the Athabasca River](#), lace the air with toxins and convert farmland into wasteland. Large areas of the [Boreal forest](#) are clearcut to make way for development in the tar sands, the fastest growing source of greenhouse gas emissions in Canada.

I am also concerned with the [social](#) and [health costs](#) of the tar sands. First Nations communities in the tar sands report unusually high levels of rare cancers and autoimmune diseases. Their traditional way of life is threatened. Substance abuse, suicide, gambling and family violence have increased in the tar sands region. Meanwhile, the thousands of workers brought in by oil companies face the boom and bust cycles of the oil economy rollercoaster.

- health effects from spills, the carcinogens, from the tar sands dilbit itself as well as the diluent.

- water and the effects from spills which have been known to reach 35 miles downstream from an occurrence. This is of special concern due to the connection from a pipeline crossing to the Kettle River. There is no spill assessment for the St Louis River, or Nemadji River. There are approx. 80 water crossings – streams, rivers, lakes. The water quality and risk analysis is wholly inadequate.

- analysis that reaches further into the future is necessary. It appears that this DEIS looks only out to about 30 years for risk assessments, this is not adequate.

- frequency of spills – this needs to be further analyzed – it appears from the data that there is an expected risk of a spill every 4 years – this means 25% chance of a spill each year. This is far too high a risk for Minnesota.

### **In Conclusion:**

This project is the wrong direction for Minnesota. I urge us to look to the future and our need to stop using fossil fuels if we want to have a healthy planet for us as well as our fellow creatures. I urge the state to take a hard look at a greater range of realistic and doable alternatives. Alternatives that do not lock us into a future of a more high capacity, extremely risky, way too expensive fossil fuel infrastructure that will be, should be, obsolete in ten years. We need to ramp down our use of toxic tar sands and move to alternatives.

What would our Planet say if she were able submit comments here today? Perhaps our planet would say – I have been your best friend since the Industrial Revolution. I have done all I can to dampen and absorb. I have tried to keep the Arctic and permafrost intact. I have sent you no invoices.

But this is about to change. Like no other generation before us we have the knowledge, technology, money and capacity to save our planet. It's a win-win, investment in green solutions creates new jobs. Sustainability has become a business case. And in the longer term, the low-carbon growth story is the only growth story on offer.

Thank you for the time to submit comments here today.

Sincerely,

Lois Norrgard

10368 Columbus Circle, Bloomington MN 55420 [lnorrgard01@gmail.com](mailto:lnorrgard01@gmail.com)

**Levi, Andrew (COMM)**

---

**From:** JoAnne Norris <joanne.norris1950@gmail.com>  
**Sent:** Saturday, June 24, 2017 9:16 AM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Draft Environmental Impact Statement for Line 3 Replacement CN-14-916 and PPL-15-137

Dear Ms. MacAlister,

TO: Minnesota DOC-----I am writing this to let you know I am in TOTAL SUPPORT OF LINE 3 REPLACEMENT!!!! It only makes sense to me to do this. I live in LaPrairie MN, right off Hwy 2. The pipeline has been wonderful. It makes so much sense to move the oil this way. Not to mention all the jobs it provides for people . Why wouldn't you go in and replace it when it needs it? This is a SAFETY ISSUE!!! Why do you have to get permission AGAIN for something that was approved years ago?? This is maintenance of the pipeline that is already there!!! Has there been problems with the pipeline? NO!! It is just OLD and needs replacing! So why are people against it? I SUPPORT THIS REPLACEMENT OF PIPELINE 3 TOTALLY!!

You can count on me backing you up on this!!!! I live at 325 Fuhrman Ave Grand Rapids MN 55744 THANK GOODNESS for President Trump who believes we should support ourselves with our own oil!!!! THANK YOU FOR SUPPORTING ENBRIDGE AND TO OK THEM TO DO THIS REPLACEMENT OF PIPE LINE 3.Only thing that makes sense to me. I am 66 yrs old and BELIEVE IN OUR COUNTRY!!! CN-14-916 PPL-15-137

Sincerely,

JoAnne R Norris  
325 Fuhrman Ave  
Grand Rapids, MN 55744  
joanne.norris1950@gmail.com

# Line 3 Replacement Project DEIS

SAINT PAUL MN 550

26 JUN 2017 PN2 L



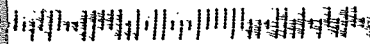
• The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.

• Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.

• Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

Docket numbers: CN-14-916; PPL-15-137



## I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                  |              |       |
|------------------|--------------|-------|
| FULL NAME        | PHONE NUMBER | EMAIL |
| ESTHER NORTH     | 918-727-1043 |       |
| ADDRESS          |              |       |
| 1515 STANFORD AV |              |       |
| CITY, STATE, ZIP |              |       |
| DULUTH, MN 55811 |              |       |

### COMMENTS

Enbridge Energy is complying with the safety issues. In today's world, everyone needs and uses fuel, including protesters who drove to protests, lights and beat their horns.

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS

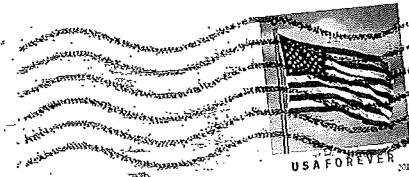
## Line 3 Replacement Project DEIS

• The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.

• Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.

• Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-916; PPL-15-137



Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

### I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                   |              |       |
|-------------------|--------------|-------|
| FULL NAME         | PHONE NUMBER | EMAIL |
| RONALD E. NORTH   | 218-727-1043 |       |
| ADDRESS           |              |       |
| 1515 STANFORD AVE |              |       |
| CITY, STATE, ZIP  |              |       |
| Duluth, Mn 55811  |              |       |

COMMENTS

EVER-ONE NEEDS AND USES FUEL

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS



Draft Environmental Impact Statement  
Public Comments

07/10/2017 for consideration in the final Environmental Impact Statement for the below mentioned dockets.

Submitted by James W Reents  
Leader, Pipeline Working Group  
Northern Water Alliance of Minnesota

**RE: IN THE MATTER OF THE APPLICATION OF ENBRIDGE  
ENERGY,LIMITED PARTNERSHIP FOR A CERTIFICATE OF NEED AND  
PIPELINE ROUTE APPLICATION FOR THE LINE 3 REPLACEMENT  
PROJECT IN MINNESOTA FROM THE NORTH DAKOTA BORDER TO THE  
WISCONSIN BORDER  
(DOCKET NOS.PL-9/CN-14-916 AND PL-9/CN-15-137)**

General comments and observations:

In reviewing the document in the time given I would first request that any information included within the EIS provided by the applicant should be highlighted and boxed with different shading such that one can evaluate the parts of the EIS which the applicant's information stands alone.

I object to the perpetuation of the applicant's "PR speak" with the use of anomalies form leaks, ruptures and pipeline failures as well as missing pipeline coating being referred to as "coating holidays". While the applicant is free to use these terms, the Department of Commerce is not. It gives the perception of bias to the applicant.

The Department of Commerce's consultant in preparing the DEIS, Cardo, states in Chapter 5: "professional judgement based upon other impact statements." I would as what other Impact statements and how they affected that professional judgement. Where any of these others done for the applicant rather than a State entity?

If cathodic protection is necessary for a pipeline, why is it installed a year after construction?

- A full economic analysis of need for additional oil transportation through Minnesota is needed. This should take into account not only the touted benefits of the proposed projects in terms of short-term jobs and additional tax contributions, but also the economic impacts of climate change and mitigation from the continued uses of fossil fuels. While there is impact locally, the economic impact should be considered on at least a national scale as decisions fragmented by state regulatory agencies have impacts



that extend well beyond their jurisdictional boundaries. Since the Environmental Impact Statement is to inform the PUC for consideration of approval or denial of the Certificate of Need, the economic analysis will provide an assessment of whether the proposed project is of benefit to the citizens of the State of Minnesota

- Climate Change needs to be integral to the EIS, not just the evaluation of the additional CO<sub>2</sub> released into the atmosphere from the product transported, but also at the end point of consumption, and on the production end. There was a news release from the Minnesota Pollution Control Agency dated June 14th of this year which cites a new report by the State's Interagency Climate Adaptation Agency (ICAT):

“For several decades Minnesota has seen substantial warming during the winter and at night, with increased precipitation throughout the year, *particularly from larger and more frequent rainstorms*. These two effects will continue to be the leading symptoms of climate change.

These changes have *damaged buildings and infrastructure, limited recreational opportunities, changed our growing seasons, and affected the quality of our lakes, rivers, and drinking water.*” (Italics added for emphasis) For the full report, contact: Risikat Adesaogun, 651-757-2056. This report should be considered in the final EIS. At present, there is no evaluation of changes in construction and specifications regarding construction and severe weather events.

- Line 3 abandonment was initially presented by the applicant with the following statement; the existing Line 3 will be flushed and filled with an inert gas and receive continued monitoring. In the DEIS, other methods of abandonment are presented. The questions unanswered in the several approaches are: for how long, and at what point does the liability revert to the state?
- Reasoning for the Line 3 relocation includes a current line that is operating at reduced capacity because of deterioration within the line. Although the date stated by the applicant has varied from 2007 to 2008, if there was such a need, and the line in such a state of deterioration the Federal Government ordered the reduced volume, why has the applicant continued to operate the line for almost a decade in this deteriorated state? Is it a public responsibility to approve another energy corridor for the convenience of the applicant when the current line demonstrates a lack of maintenance on the existing line and poor planning on the part of the applicant in the existing energy corridor? The DEIS states in Section 3.1 that the risks associated with pipeline removal are similar to a new pipeline project. The applicant also states that repair or removal would inconvenience existing landowners. What about the inconvenience of landowners on the proposed route or any of the alternatives?
- Tar sand oil cleanup methodology; none currently exists for cleanup on water and analysis of risk based upon water crossings and water proximity should become part of the EIS Scope. Information is provided regarding the specific gravity of the dilbit stating it is lighter than water and therefore floats. While the NSF study does state that the oil initially floats, it does so only until the diluent evaporates or is floated off; the tar sands sink. This should be corrected and the NSF study should be referenced.



- Evaluation of the cost of carbon mitigation of the proposed trans-shipped oil in light of climate change and atmospheric carbon reduction goals; both statewide, nationally, and also those targets committed to by the US in the 2015 Paris Climate Summit should be included within the EIS. Nothing done in Minnesota impacts only Minnesota. Carbon impacts should be considered from point of extraction to final consumption.
- What will become of stranded assets? Current estimates on Bakken and Williston Basin Oil is that they will be depleted in 20 years. The Canadian Government is saying 80 to 90% of the tar sand oils in Alberta should remain in the ground, negating , except for the short term, any need for a new Line 3. What's to become of the infrastructure? Removal? Abandonment? Other proposed uses by the applicant?
- Most major players in the Alberta Tar Sands have either delayed, put on hold, and in some cases, such as Statoil, have pulled out of Tar Sand Oil. Need for additional oil should be included within the EIS. This should be based upon current industry data, not government projections which overestimate demand in light of the changing world dynamics.
- Is the proposed Line 3 as a 36-inch diameter pipeline (12% larger by volume) actually a replacement or an entirely new pipeline, which needs a new US State Department approval? Why is it being considered by the state without this determination. The applicant's statement that it can undertake these improvements under a 1960's permit should, at the very least be questioned and confirmed by the U.S. State Department
- The current State Department EIS review of the Alberta Clipper should be included within the scope of the EIS. Presently, the Alberta Clipper is operating at a capacity for which the lie has yet to be approved through the sleight of hand Line 3 / Alberta Clipper bypass at the Canadian Border. The currently underway EIS was a condition of the original approval of the Alberta Clipper. The inclusion would enhance the evaluation of the Sandpiper ? Line 3 Energy Corridor proposals. One example: it is our understanding that the spill modeling in the current DEIS only analyzes 10 mile downstream while the Alberta Clipper review models 20 mile downstream. No explanation is given for the change in criteria and then the information is closely held "for security reasons".



- The EIS should include spill modeling under both average and worst-case weather conditions on all river crossings as well nearby lakes, streams and wetlands. Too often modeling is done at average or perfect weather conditions that in turn can skew the findings. The northern part of Minnesota through which this proposal passes experiences at least 5 months of winter and almost as long a period of ice cover. This needs to be taken into account with any modeling. See note above; hard to evaluate information that is withheld.
- Impacts on both natural and human resources: including but not limited to those natural and human resources of importance to the Native Bands and including their retained rights under the 1837, 1854, and 1855 Treaty Areas. The statement of dismissal that native groups would be unfairly impacted by the proposed route but it is not a reason for denial appears racist, whether that was the intent or not. The issue of the exploitation of women was dismissed with the statement that the applicant would provide educational training around the issue for its contractors. This is not acceptable.
- The EIS should include the entirety of the project from beginning to end; i.e.: from the Tar Sands of Alberta or the Bakken and Williston Basin fields in North Dakota to the Gulf Coast.
- The EIS should not assume that the criteria for route evaluation include any intermediate through-points ( Clearbrook or Superior) . In the public input sessions conducted by the Department of Commerce, it was unclear as to how system alternatives and route alternatives would be evaluated within the EIS. To be fair to both the applicant and the citizens of Minnesota, both system alternatives and route alternatives should be included within the EIS. The inclusion of the rail and trucking alternatives have no basis in reality. If there is a need for an additional 300,000+ BBD of dilbit from Alberta or any combination of oil types, it is currently being accommodated by other transportation methods. To imply greater risk to large urban areas if the proposal is not built ignores both the market place and restrictions (or lack thereof) of hauling liquids of greater hazard. These options should be stricken from the final EIS or at a minimum refined so that they make sense.

- Enbridge's initial applications include some information, it should not be used to limit the scope of the EIS nor should any conclusions by the applicant become part of the final EIS. Initially within the proceedings, route alternatives were eliminated based primarily on additional cost to the applicant. Cost to the applicant should only be considered if there is also a public cost considered. Instead, based on the evaluation of the EIS of both route and system alternatives, the least environmentally sensitive with the least impact on Minnesota's natural resources should be considered along with the no build option.

---

PO Box 455 Hackensack, MN 56452 | 218-675-5773 | [nwa-mn.net](http://nwa-mn.net)



- A request by the Department of Commerce to add an economist speaks to a lack of time and staff to accomplish the incorporation of public comment into the final EIS in the 30 days within their schedule. One would ask, behind the scenes, who is driving the schedule.
- There should be a chapter included in the final EIS which speaks only to water as a public resource within the state. The quality of the water for drinking purposes as well as the downstream demand for that drinking water over the life of the project needs to be included. One study by the Humphrey School of the University of Minnesota states that because of the current rate of water table drawdown by the metro suburbs, all of the metro area (the majority of the population of the state) will be relying on the Mississippi River for their water supplies within 13 years (2030) Swackhammer, UMN.
  - Additionally, there is a blanket statement accepted within the DEIS that the groundwater table is at a depth of 10 feet. In light of the many wetland and water crossings, I would question 10 feet as even an average. I would estimate that the majority of the pipeline, buried at the 7 foot depth stated in the DEIS would be

within the water table. Pinhole leaks have a potential to contaminate the water table and remain undetected for long periods of time. While the applicant states they will monitor throughput for loss, they use terms like “beyond a certain threshold for line loss” and “predetermined minimums and maximums”. What are these potential losses? Over time? Hydro testing is mentioned with a demand for 11 to 17 million gallons per spread. No water source of water is identified and the water discharge plan which is approved by the applicant. As statement is made about treating the water before discharge, but to what standard? Water testing on an existing line done, I believe in 2015, sourced water from the Red River in North Dakota and discharged it in Wisconsin. No concern was apparent at that time for treatment. In Northern Minnesota, in light of our challenges with aquatic invasive species, we should not be considering these volumes of water transferred from one point to another without a plan approved by the MPCA.

. The construction plans and techniques are obviously provided by Enbridge boilerplate but it is stated that only Enbridge has the right to issue a stop work order. Especially in light of high pollution sensitivity areas identified, does it not seem reasonable that the State and Federal Governments should have the final say as to appropriate construction and adherence to the required permits issued. We don’t want a “fox guarding the henhouse” situation. Any applicant cannot be trusted to adhere to permits and construction techniques unless verified. The State should step up and not just rely on the applicant’s statements.

---

PO Box 455 Hackensack, MN 56452 | 218-675-5773 | [nwa-mn.net](http://nwa-mn.net)

Please provide your contact information. This information and your comments will be publicly available.

Name: Jeff Novak

Street Address: 17858 240 ST NW

City: Viking State: MN Zip Code: 56760

Phone or Email: jeff.novak@enbridge.com

Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

~~\*\*\*~~ I am for the L3 Replacement project. It will bring alot of jobs for the local area, also all the money it will bring for the local businesses, resturants; hotel etc.

Please provide your contact information. This information and your comments will be publicly available.

Name: Lance Novacek  
Street Address: 10386 390th ST NE  
City: Middle River State: MN Zip Code: 56737  
Phone or Email: Lancenovacek@yahoo.com

Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

I agree with this project. I have worked for this company for 13 years. The people that work for them - contractors or company personnel are good people and do the correct things and know right from wrong. I am an outdoors person. Love to hunt, fish, enjoy the outdoors - I work on these pipeline systems AND they are safe. I go home every night safely to my family. This industry is part of my lively hood - along with siblings, friends, family. It is very important for the country, state, and community for this infrastructure to be in place. Thanks



Please provide your contact information. This information and your comments will be publicly available.

Name: Lance Novacek  
Street Address: 10386 390TH ST NE  
City: Middle River ~~ND~~ State: MN Zip Code: 56737  
Phone or Email: Lance.novacek@yahoo.com

Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

I support the L-3 project. ~~I would~~ I would  
like to see a statistic that shows all  
the product that travels from point A to point  
B. that actually makes it to its destination  
throughout North America. The DEIS should  
show job creation for construction. Thanks

**From:** [Curt Nyegaard](#)  
**To:** [MN COMM Pipeline Comments](#)  
**Subject:** Draft Environmental Impact Statement for Line 3 Replacement CN-14-916 and PPL-15-137  
**Date:** Wednesday, May 31, 2017 8:40:05 PM

---

Dear Ms. MacAlister,

Replace L3

Sincerely,

Curt Nyegaard  
27833 380th St  
Shevlin, MN 56676  
[nyegaard@gvtel.com](mailto:nyegaard@gvtel.com)

## Levi, Andrew (COMM)

---

**From:** Curtis Nyegaard <curtis.nyegaard@gmail.com>  
**Sent:** Thursday, June 15, 2017 3:41 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Subject:** Personal opinion

My name is Curt Nyegaard and I have worked in safety in North American Oilfields for the last 5 years. I have walked entire ROW's from Tioga, ND to Park Rapids, MN; and much of it east of Park Rapids to Superior, WI. I believe the North American Oil Industry must and can do a better job in advertising the due diligence "we" exercise. I believe there are many opportunities to build partnerships with the public to provide education and give transparency and a shared ownership in our energy future. I believe we are uniquely positioned in North America to advertise our strong stewardship of the environment, to give credibility to our strong community commitments and to highlight the ways we make lives better in North America. To provide contrast, just peek south to Venezuela, South America or any other countries with vast oil reserves and see their track record regarding people and the environment! Things like grassland surveys, insect surveys, flora-fauna surveys, bat surveys, calcareous fen surveys and migratory bird surveys are just a small sample of the due diligence served to prove outstanding stewardship of the environment. Real science, with credible 3<sup>rd</sup> party providers will stand the scrutiny of critical review.

I live in Clearwater County, Shevlin township in rural Minnesota. I have a strong local stake in the proposed L3R project in MN. I feel there are powerful similarities between the Agricultural Industry and the Energy Industries. I have worked in both! Both industries must be strong stewards of the environment and we both need the people that we provide with food, fiber and energy, to understand and support our efforts. Before my oilfield career I worked with the University of Minnesota Extension Service - 4-H youth development. I feel there are a myriad of possibilities for education and development of partnerships that will serve the greater good for our citizens and our industries. We all need each other and sadly a significant population of our society does not even realize this. I believe there is nowhere in the world that the energy industry works as hard or cares as much for developing infrastructure and natural resources (ETHICALLY) as we do here in North America (Canada and the US)! That being said, I feel we must be intentional in our growth of "public perception" to be successful in our continued development.

**Curtis Nyegaard**, CSP

Mobile [218-556-4441](tel:218-556-4441)

[curtis.nyegaard@gmail.com](mailto:curtis.nyegaard@gmail.com)

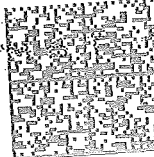
## Line 3 Replacement Project DEIS

• The Draft Environmental Impact Statement (DEIS) is an in-depth analysis that took more than 15 months and 27 public meetings to scope and develop.

• Years of environmental study: Enbridge conducted more than 1,200 meetings with local stakeholders over four years and has spent thousands of hours studying the replacement route.

• Infrastructure replacement: As a maintenance project, the time is now to replace and modernize Line 3.

Docket numbers: CN-14-9161 RPL 15-187-1-111



02 1P  
0000879328 JUN 27 2017  
MAILED FROM ZIP CODE 55811

Jamie MacAlister  
Environmental Review Manager  
Department of Commerce,  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198

### I SUPPORT THE LINE 3 REPLACEMENT PROJECT

|                                      |                              |                                |
|--------------------------------------|------------------------------|--------------------------------|
| FULL NAME<br>David Nyegaard          | PHONE NUMBER<br>218-556-9931 | EMAIL<br>davidnyegaard@att.net |
| ADDRESS<br>1298 Valley St. Sw.       |                              |                                |
| CITY, STATE, ZIP<br>Dorsey, MN 56021 |                              |                                |

COMMENTS

---



---



---



---



---

DECLARE THE EIS ADEQUATE WITHIN 280 DAYS